

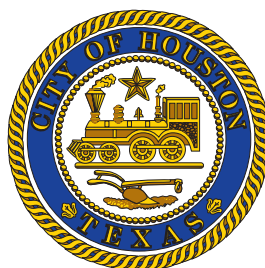
CITY OF HOUSTON

# LOCAL ACTION PLAN

HURRICANE HARVEY  
HOUSING RECOVERY



JUNE 2018



# HOUSTON LOCAL ACTION PLAN

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CITY OF HOUSTON  
SYLVESTER TURNER, MAYOR

HOUSING AND COMMUNITY DEVELOPMENT DEPARTMENT

TOM MCCASLAND, DIRECTOR

JUNE 2018

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## I. Executive Summary

In response to Hurricane Harvey and the presidentially declared disaster, Congress appropriated more than \$5 billion to the State of Texas for recovery assistance. The Texas General Land Office (GLO) is applying for and administering these funds on behalf of the state. The GLO has made a direct allocation to the City of Houston (City) and Harris County, and therefore both the City and Harris County must develop a local action plan.

The City of Houston has followed the GLO's guidance and has created Houston specific information to be incorporated into various sections of the GLO's *State of Texas Plan for Disaster Recovery: Hurricane Harvey – Round 1* through a substantial amendment. The local information in the City's action plan includes local needs assessment, connection to unmet needs, local programs and requirements, local consultation, and expenditure timelines.

A summary of the unmet needs assessment is identified in the following table. This needs assessment aligns with the GLO's assessment, as feasible.

Table 1: Summary of Total Unmet Need – City of Houston

Category	Unmet Need	% of Unmet Need	CDBG-DR Investments*	% of Houston Program Allocation
Housing	\$5,741,049,341	55%	\$1,054,177,859	95%
Infrastructure	\$1,293,794,266	32%	\$0	0%
Economic	\$1,401,319,818	13%	\$60,000,000	5%
<b>Total</b>	<b>\$10,490,817,727</b>	<b>100%</b>	<b>\$1,114,177,859</b>	<b>100%</b>

\*Allocation amount does not include planning costs

There are additional gaps and unmet needs not reflected in this assessment. The City will continue to gather and refine information, such as data and public input, which will continue to inform the CDBG-DR process and programming. The following table shows the City of Houston's allocation of CDBG-DR funds.

Table 2: Total Allocation Budget – City of Houston

Program		HUD Most Impacted Areas (80%)	State Most Impacted Areas (20%)	LMI Amount (70% of Total Allocation)	Total	% of Total Allocation by Program	% of Total Allocation	Total
Direct Programs	City of Houston	\$ 1,155,119,250	-	\$ 808,583,475	\$ 1,155,119,250	22.99%	45.19%	\$ 2,270,506,080
	Harris County	\$ 1,115,386,830	-	\$ 780,770,781	\$ 1,115,386,830	22.20%		
Direct Allocation Subtotal		\$ 2,270,506,080	-	\$ 1,589,354,256	\$ 2,270,506,080			
State Programs State of Texas		\$ 2,202,967,136	\$ 550,741,784	\$ 1,654,496,406	\$ 2,753,708,920	54.81%	54.81%	\$ 2,753,708,920
State Allocation Subtotal		\$ 2,202,967,136	\$ 550,741,784	\$ 1,654,496,406	\$ 2,753,708,920			
City of Houston Programs								
City of Houston Housing	Homeowner Assistance Program	\$ 385,028,859	-	\$ 269,520,201	\$ 385,028,859	7.66%	20.73%	\$ 1,041,754,416
	Single Family Development Program	\$ 200,000,000	-	\$ 140,000,000	\$ 200,000,000	3.98%		
	Multifamily Rental Program	\$ 314,979,000	-	\$ 220,485,300	\$ 314,979,000	6.27%		
	Small Rental Program	\$ 60,005,000	-	\$ 42,003,500	\$ 60,005,000	1.19%		
	Homebuyer Assistance Program	\$ 21,315,000	-	\$ 14,920,500	\$ 21,315,000	0.42%		
	Buyout Program	\$ 40,000,000	-	\$ 28,000,000	\$ 40,000,000	0.80%		
	Housing Admin	\$ 20,426,557	-	\$ 14,298,590	\$ 20,426,557	0.41%		
City of Houston Public Services and Economic Revitalization	Public Services	\$ 60,000,000	-	\$ 42,000,000	\$ 60,000,000	1.19%	1.80%	\$ 90,264,834
	Economic Revitalization Program	\$ 30,264,834	-	\$ 21,185,384	\$ 30,264,834	0.60%		
City of Houston Planning	Houston Planning	\$ 23,100,000	-	\$ 16,170,000	\$ 23,100,000	0.46%	0.46%	\$ 23,100,000
City of Houston Allocation Subtotal		\$ 1,155,119,250	-	\$ 808,583,475	\$ 1,155,119,250			
Grand Total Allocation		\$ 4,473,473,216	\$ 550,744,784	\$ 3,243,850,662	\$ 5,024,215,000	100%	100%	\$ 5,024,215,000



## II. Needs Assessment

### A. Cumulative Impact of Prior Disasters

Houston's flat terrain and topography make it vulnerable to flooding. Over the past decade, Houston has experienced several major flood events from hurricanes and storms. Hurricane Ike was a strong Category 2 storm when it made landfall in Galveston in 2008. Many residents lost power for several days, with approximately 95 percent of CenterPoint's 2.26 million customers losing power<sup>1</sup>.

In 2015 and 2016, the region received unprecedented rainfall from several storms, which led to many neighborhoods experiencing flooding multiple times in a two-year period. During Memorial Day weekend and Halloween weekend in 2015, Houston experienced severe flooding from storms that impacted the wider Gulf Coast area. The President declared both events major disasters. In April and June 2016, Houston once again received record-breaking rainfall and experienced severe flooding. The President also declared these two flood events major disasters. Almost one third of the 16,000 buildings damaged in the 2015 and 2016 flood events were located outside the FEMA floodplains.

These flood events were followed by Hurricane Harvey in 2017. The cumulative impact of these disasters has been devastating in Houston and the scale of damage is unprecedented. Thousands of residential and commercial buildings have been damaged. Infrastructure has been overwhelmed or destroyed, and there has been loss of life and property. According to estimates, no other area in the country has experienced this level of devastation from flooding and the cost associated with the impact of these disasters is at an extraordinary scale not experienced before.

### B. Impact of Hurricane Harvey

Hurricane Harvey made landfall on the Texas coast as a category 4 hurricane on August 25, 2018, and as it moved inland, it slowed and stalled over the Houston area. A heavy rain band developed over Fort Bend and Brazoria counties and spread into Harris County. The Houston area received unprecedented levels of rainfall in the next two days as the system remained stalled, dumping over 50 inches of rain in the area, according to the National Weather Service, making it a 1-in-1,000-year flood event. According to the National Hurricane Center, Harvey's rainfall is the highest-ever recorded rainfall for a tropical storm in the continental United States since rainfall records began in 1880.

While Hurricane Harvey did not cause extensive wind damage and power outages to Houston, it brought on prolonged and widespread flooding. The flood event initially lasted several days, and thousands of Houstonians had to evacuate their homes. Areas in Houston had flood water levels between 1 foot and 6 feet. According to HoustonRecovers.org, there were more than 8,500 calls to 911 on just one day, August 27, 2018, approximately 3,000 more than in an average day. Many Houstonians were rescued by emergency responders. Others were rescued by volunteers with access to large trucks and boats, including an ad hoc volunteer group of private boat owners known as the Cajun Navy. Neighborhoods in the Memorial and Energy Corridor area in West Houston, which is downstream from the Addicks and Barker reservoirs, remained under water for almost

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<sup>1</sup> State Impact. (September 2013). Restoring Power: What Houston Learned from Ike.  
<https://stateimpact.npr.org/texas/2013/09/12/restoring-power-what-houston-learned-from-ike>

two weeks. Homes in these neighborhoods had flood water levels of 5 feet and over as water was released from the dams downstream into Buffalo Bayou over a period of several days.

An estimated 29 percent of the city's population was likely affected by Hurricane Harvey through damage to their homes from floodwaters. Over 24,000 families were displaced from their homes according to estimates of FEMA-funded hotel room statistics<sup>2</sup>. This number vastly underrepresents the actual number of families displaced, as many people found shelter with family or in local shelters in religious community centers, rented units or recreational vehicles. It also excludes people who did not or could not seek FEMA's help. The days after the storm saw an estimated 37,000 people sheltering in over 270 Red Cross and partner facilities in Houston. There were 11,000 people sheltering at the George R Brown Convention Center alone<sup>3</sup>.

After the flooding subsided, the massive cleanup began. The City and its contractors removed over 2 million cubic yards of debris from gutted homes, buildings and ravaged neighborhoods, which is the amount that would fill 622 Olympic size swimming pools. Houstonians, as well as people from around the country, donated supplies and volunteer time to assist with short-term recovery efforts. The City and nonprofit organizations used Crisis Cleanup, an online collaborative disaster work order management platform, to coordinate volunteer efforts, assisting thousands of residents clean out their homes to prevent mold and other indoor hazards.

Harvey's impact is not limited to loss of life, property and infrastructure. There has been loss of economic activity and disruption to schools. The Houston Independent School district suffered damage to several schools, some of which had to close for the year, affecting 6,500 students. As floodwaters have receded, concerns about environmental impact of damaged petrochemical plants to the air and water quality in the city have also emerged.

The following map shows flooding above one foot in Houston during Hurricane Harvey.

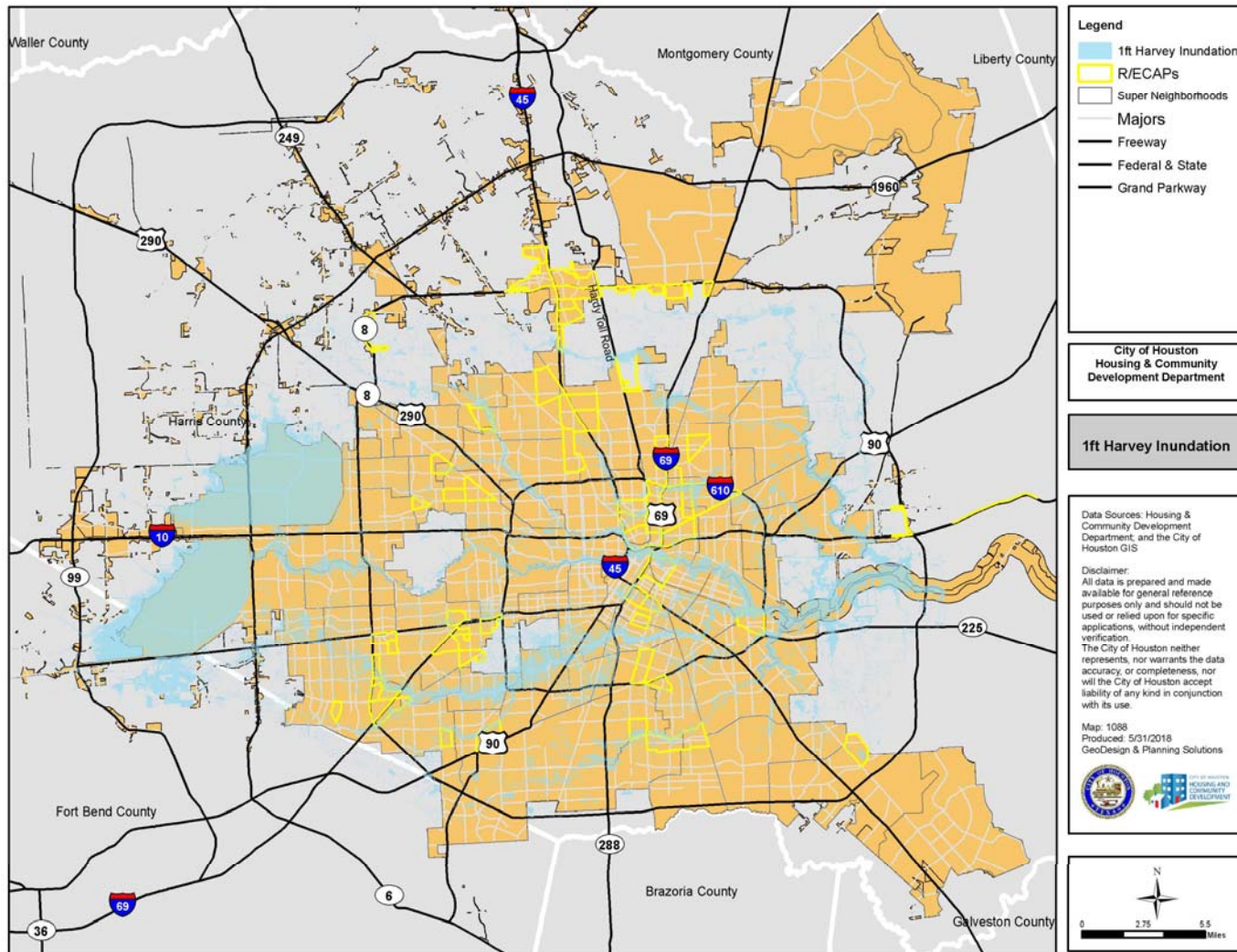
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<sup>2</sup>Kinder Institute of Urban Studies, (December 2017). What's Next for Houston After Harvey?  
<https://kinder.rice.edu/2018/01/08/whats-next-for-houston-after-harvey>

<sup>3</sup> Fox News. (August 2017). Tropical Storm Harvey Evacuees Surge to Houston Shelter.  
<http://www.foxnews.com/us/2017/08/30/houston-shelters-including-sports-stadiums-mosques-swell-with-harvey-evacuees.html>



Figure 1: Hurricane Harvey 1-Foot Inundation Map



### C. Demographic Profile of Impacted Counties

Houston has a population of 2.2 million and is part of the fastest growing and most ethnically and culturally diverse metropolitan area in the country<sup>4</sup>. Houston comprises more than one fourth of the combined population of the 49 CDBG-DR Eligible Counties. The median household income for Houston is lower than Texas, but the median rent and median value of owner-occupied units is almost equal to Texas. This combination of low-incomes and high housing costs mean that housing affordability is an even greater challenge for Houston than other areas in the state.

According to the 2016 American Community Survey estimates, over 22 percent of the population is African American, almost 7 percent is Asian, 58 percent is White, and 12 percent is two or more races or some other race. Close to 45 percent of Houston's population is Hispanic or Latino. The population identifying as Hispanic or Latino/a are the racial/ethnic majority in Houston, which differs from the State and combined 49 Eligible Counties.

Houston's population is changing and almost one third of Houston's residents are immigrants. An estimated 14 percent of all households, or 116,473 households, in Houston have limited English proficiency. This means that these residents face a language barrier and may require additional support during the recovery process. They may also have not been able to apply for immediate assistance from FEMA and therefore, may not be represented in the FEMA Individual Assistance data, which is used in this document to determine housing needs in Houston.

Approximately 22 percent of adults in Houston lack a high school diploma, which is much higher than the percentage of adults in Texas who lack a high school diploma. The median household income in Houston is \$47,010. Poverty is defined each year by the U.S. Department of Health and Human Services; in 2017, families of four making below \$24,600 in the 48 contiguous states were identified as in poverty. Nearly 22 percent of people live below the poverty line in Houston compared to only 16 percent in the state.

The following table provides a summary of the demographic and housing information in Houston in comparison with demographic and housing information from Texas.

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<sup>4</sup> Kinder Institute of Urban Studies, (2018). The 2018 Kinder Houston Area Survey. [https://kinder.rice.edu/sites/g/files/bxs1676/f/documents/Kinder\\_percent20Houston\\_percent20Area\\_percent20Survey\\_percent202018.pdf](https://kinder.rice.edu/sites/g/files/bxs1676/f/documents/Kinder_percent20Houston_percent20Area_percent20Survey_percent202018.pdf)

Table 3: 2016 Demographic Statistics for Texas and Houston from the U.S. Census Bureau

Fact	Texas	City of Houston	
	Estimates	Estimates	Percent of Area
Population, 2016	27,862,596	2,240,582	8% of Texas Population
Population, percent change – April 1, 2010, (estimates base) to July 1, 2016	10.80%	7%	
Persons under 5 years, percent, 2016	7.20%	175,167	7.8% of City
Persons under 18 years, percent, 2016	26.20%	567,297	25.3%
Persons 65 years and over, percent, 2016	12.00%	219,012	10.0%
White alone, percent, 2016	79.40%	1,305,482	58.3%
Black or African American alone, percent, 2016	12.60%	511,398	22.8%
American Indian and Alaska Native alone, percent, 2016	1.00%	8,047	0.4%
Asian alone, percent, 2016	4.80%	149,265	6.7%
Native Hawaiian and Other Pacific Islander alone, percent, 2016	0.10%	1,256	0.1%
Two or More Races, percent, 2016	1.90%	44,986	2.0%
Hispanic or Latino, percent, 2016	39.10%	992,886	44.3%
White alone, not Hispanic or Latino, percent, 2016	42.60%	562,237	25.1%
Housing units, 2016	10,753,629	937,245	
Owner-occupied housing unit rate, 2012-2016	61.90%	359,118	38.0% of Housing Unit
Median value of owner-occupied housing units, 2012-2016	\$142,700	\$140,300	
Median gross rent, 2012-2016	\$911	\$898	

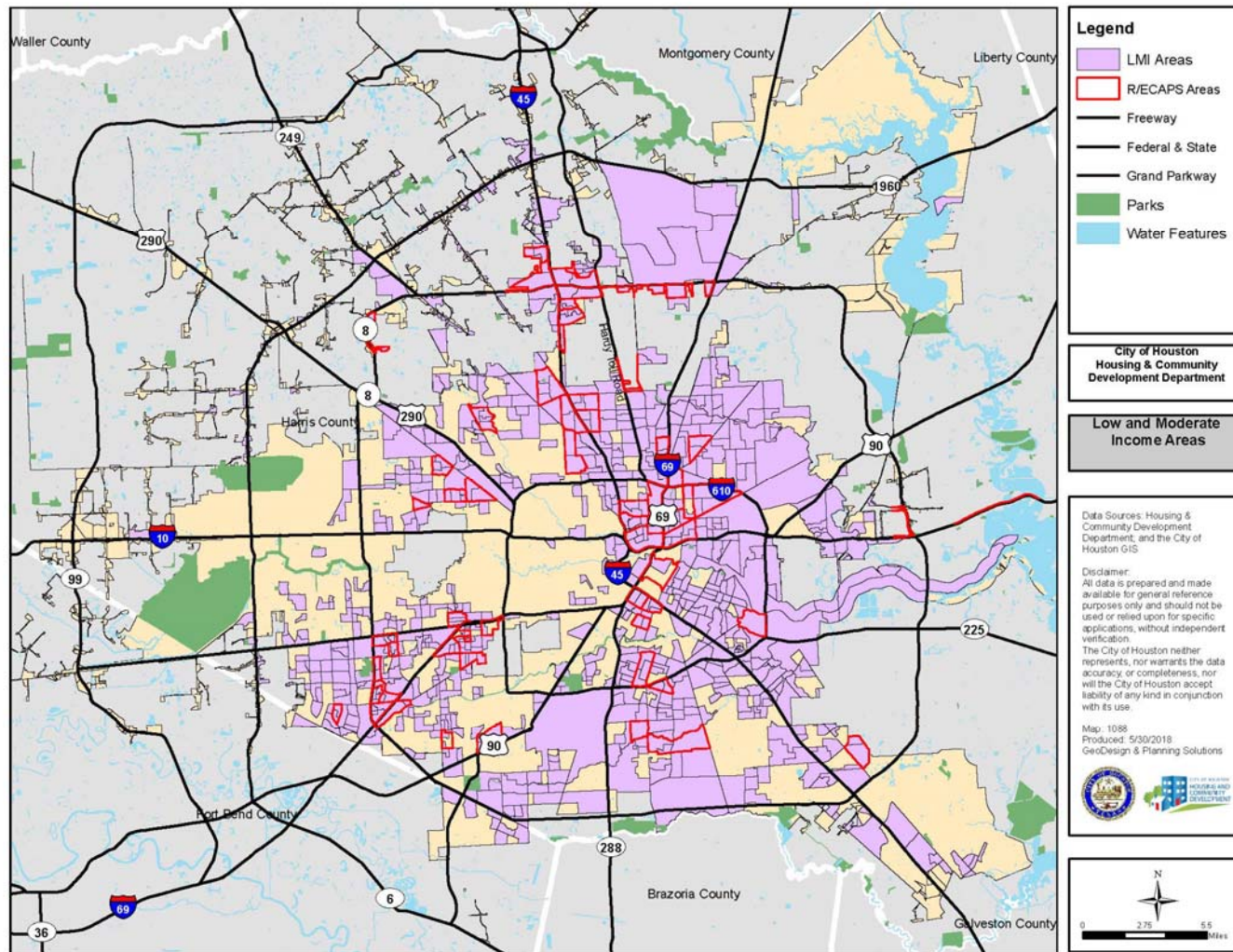
	<b>Texas</b>	<b>City of Houston</b>	
With a disability, under age 65 years, percent, 2012-2016	8.10%	136,693	6.0%
Median household income (in 2016 dollars), 2012-2016	\$54,727	\$47,010	
Median household income for owner-occupied units (in 2016 dollars), 2012-2016	\$70,980	\$71,418	
Median household income for renter-occupied units (in 2016 dollars), 2012-2016	\$36,330	\$35,250	
Persons in poverty, percent	15.60%		21.9%
Cost burdened owner-occupied units, 2012-2016	21.17%	84,246	23.46% of owner-occupied units
Cost burdened renter-occupied units, 2012-2016	44.35%	223,952	47.44% of renter-occupied units
Land area in square miles, 2010	261,231.71	600	6.7% of Metro Area

Source: City of Houston from American Community Survey 2012-2016.

#### **D. Low- and Moderate-Income Analysis**

The following map identifies census block groups that have a low- and moderate-income population of 51 percent or more in the City of Houston using HUD's 2017 Low- and Moderate-Income Summary Data (LMISD). It also shows the Racial and Ethnically Concentrated Areas of Poverty (R/ECAPs), defined by HUD as census tracts where more than half the population is non-White and 40 percent or more of the population is in poverty.

Figure 2: Percentage of LMI Population by Block Group with R/ECAPs

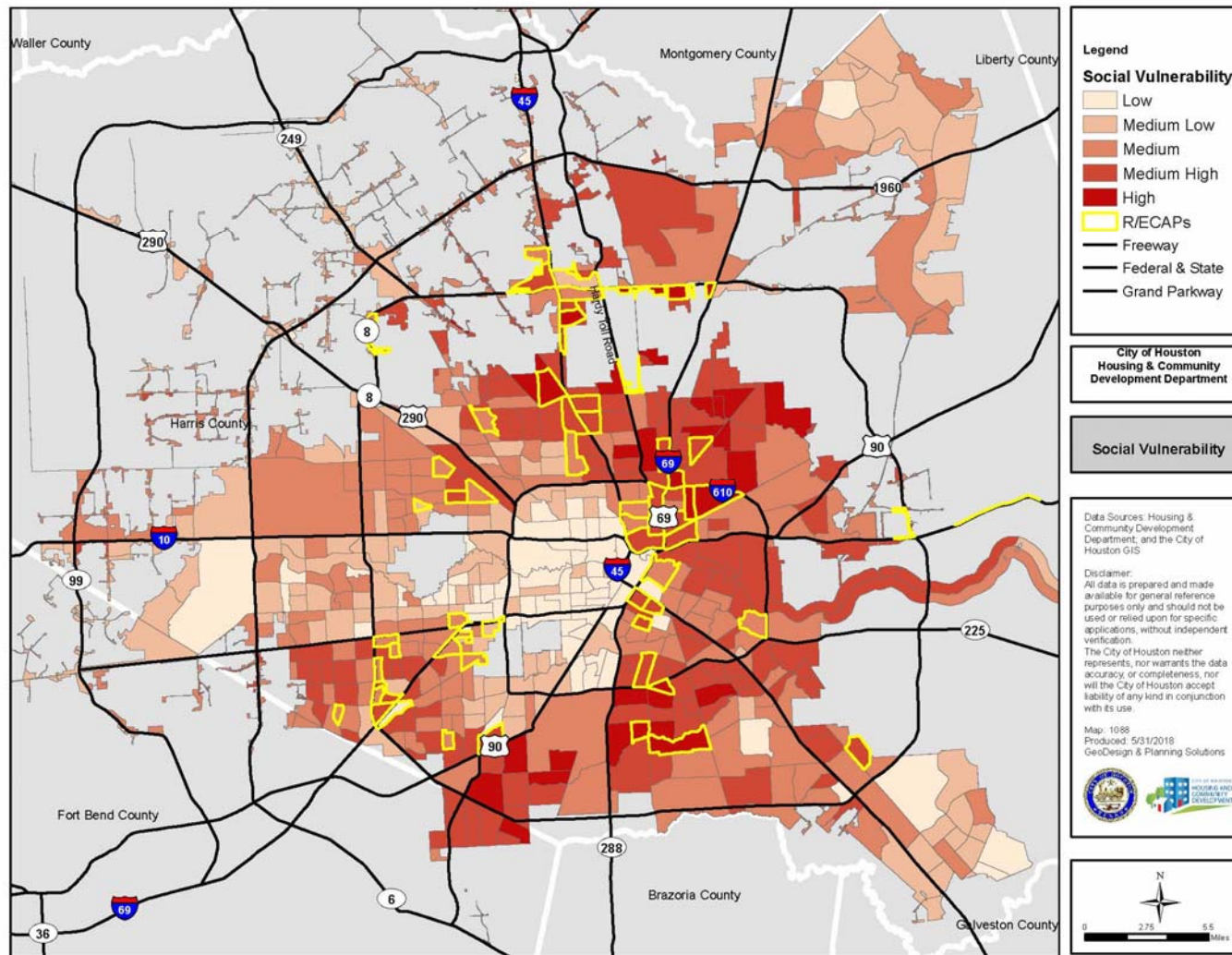


## **E. Social Vulnerability Index**

The following map of the City of Houston identifies the communities that will most likely need support before, during, and after a hazardous event, as determined by the Social Vulnerability Index (SoVI). Census tracts that rank in the top 80 percent nationally are communities marked as having a “High” social vulnerability. In Houston, areas with high vulnerability somewhat correspond with low- and moderate-income areas and areas that are predominately minority, including Racial and Ethnically Concentrated Areas of Poverty (R/ECAPs).



Figure 3: Social Vulnerability Index with R/ECAPs for City of Houston





## **F. Housing Impact**

### **1. Real Estate Market**

One of the strongest areas of the Houston economy is the real estate sector. Total property sales have been increasing steadily in recent years. According to the American Community Survey, there are over 930,000 housing units in Houston with a homeowner vacancy rate of 1.9 and a rental vacancy rate of 7.7. The median price for an owner-occupied home is \$140,300. Hurricane Harvey caused home sales to fall somewhat in August 2017, however, the market rebounded immediately and saw increases in home sales from the same period the previous year<sup>5</sup>. According to the Texas A&M Real Estate Center, Houston continues to lead nationally in the number of permits issued for single family home building. In 2018, single family construction permits are estimated to increase by 14 percent. The average annual growth rate of single family construction permits has been close to 6 percent from 1991 to 2017.

Despite having a strong market for residential homes, Houston is a majority renter city with almost 57 percent of Houstonians renting homes. The median gross rent is \$898 and almost half of all renters are housing cost burdened, meaning over 30 percent of their household income is spent on housing. While home sales have been robust and over 99 percent of homes have complete plumbing and kitchen facilities, most of the housing stock in the city is aging. Over half (56 percent) of all the homes in Houston were built before 1979. That is a significantly large percentage compared to the housing stock in the rest of the state, where approximately 41 percent of the homes are built before 1979.

The demand for housing, especially affordable homes, in Houston was high even before Hurricane Harvey impacted the city. Since Hurricane Harvey, the housing supply has decreased due to uninhabitable, flooded homes. This, in turn, has further decreased the already limited supply of affordable homes as a growing number of renters and buyers compete for a reduced supply of units.

Over half of the 830,000 households were housing cost burdened in the years leading up to Harvey.<sup>6</sup> This number is expected to rise even higher in 2018 as a result of Harvey's impact on housing affordability in Houston. Renters in Houston are far more cost burdened than owners- 23 percent of owner-occupied housing units have cost burdened residents where as 47 percent of renter-occupied housing units have cost burdened residents. A person is considered housing cost burdened when they spend more than 30 percent of their income on housing expenditures such as rent or mortgage.

The decreasing number of available units and heightened demand means that the gap between the supply of and demand for housing is greater than it was prior to Hurricane Harvey.

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<sup>5</sup> Greater Houston Partnership Research (2017). Houston Economic Highlights.  
<http://www.houston.org/assets/pdf/economy/Economic-Highlights-2017-web.pdf>

<sup>6</sup> Houston Chronicle, February 2017 Putting numbers on Houston's demand for more affordable housing,  
<https://www.chron.com/business/texanomics/article/Putting-a-number-on-Houston-s-affordable-housing-10945884.php>

The Houston metro area also has a higher square footage per housing unit than the state. According to U.S. Census, American Housing Survey, 2015, (AHS) the Houston-The Woodlands-Sugar Land, TX Metropolitan Statistical Area (MSA) has a higher median square footage per housing unit than Texas, with a median square footage of 1,800 for the Houston MSA compared to the median of 1,600 square feet for Texas. According the AHS, 35% of homes in the Houston MSA are 2,000 square feet or more, compared to 28% of Texas homes. With a larger proportion of homes having higher square footage in the Houston MSA, it is anticipated that repair costs per unit will likewise be higher in the Houston MSA than the remainder of the state.

Neighborhoods of all incomes and housing values have been affected by flooding because of Hurricane Harvey. Many homes in the Memorial and Briar Forest Super Neighborhoods, that have higher square footage and median home value compared to the city's and state's average, were impacted by severe flooding for weeks after the storm, as water was released from Barker and Addicks reservoirs into Buffalo Bayou. Both renter- and owner-occupied homes in the area were impacted by floodwaters as high as 6 feet for over two weeks. According to the Houston Planning and Development Department, in 2015, the median housing value in Briar Forest was \$222,903 and in Memorial it was \$366,629; both median values were much higher than the city's median value, at \$131,700. In addition, with amendments to Chapter 19 of the Code of Ordinances, which includes the City's Floodplain Ordinance, many homes in need of minor repairs from flood damage may now need more extensive repairs related to elevation to comply with the new regulations. While most of these homes will not need to be reconstructed, they will need extensive repair, which will be more expensive due to the larger size and higher median value of these homes compared to the rest of the city and state.

## **2. Homelessness**

The City of Houston has been working to reduce homelessness over the past several years. The City has utilized various sources of funds to undertake programs that help vulnerable populations at risk of becoming homeless and persons who are homeless and need shelter and public services. Recently, the City has partnered with the Houston Housing Authority to administer a tenant based rental assistance program funded by HOME Investment Partnerships Program (HOME), which has helped households at risk of becoming homeless stay in their homes. Several public service activities, such as health care services for the homeless, day shelter programs, and other homeless shelter programs funded through Community Development Block Grants (CDBG), have helped provide homeless persons access to shelter and needed services. The City continues to utilize the Emergency Solutions Grant (ESG) to fund housing relocation and stabilization services for rapid-rehousing, prevent homelessness through providing rent and utilities assistance, and provide emergency shelter services.

Along with HOME, CDBG, and ESG funds, Houston has also utilized the Housing Opportunity for Persons with AIDS (HOPWA) and Homeless Housing and Services Program (HHSP) funds to help homeless persons and families and those at risk of becoming homeless through rental assistance, housing placement and shelter services, and healthcare services. Since 2012, the City has worked closely with community partners to create and provide permanent supportive housing.

The Coalition for the Homeless of Houston/Harris County (Coalition) provides leadership in the development, advocacy, and coordination of community strategies to prevent and end homelessness. It also serves as the lead agency for the Houston/Harris County Continuum of Care and conducts a Point-In-Time (PIT) Count of sheltered and unsheltered persons experiencing homelessness in Houston, Harris County, Fort Bend County, and Montgomery County area once a year over a three-day period. The purpose of the PIT Count is to determine the number of persons experiencing homelessness, as defined by HUD.

From 2011 to 2017, the number of sheltered and unsheltered homeless persons in Houston, Harris County, and Fort Bend County decreased by 60 percent, from 8,538 to 3,412 persons, according to the Coalition. In addition, unsheltered chronic homelessness decreased by 82 percent. In 2017, 39 percent of the unsheltered homeless individuals had a high school diploma or GED; 21 percent had some college or a college degree or higher; 25 percent of unsheltered homeless individuals reported no income; and 20 percent reported panhandling for income.

On May 23, 2018, the Coalition released the PIT Count for 2018. It shows the number of homeless has increased by 15 percent in one year, from 3,605 to 4,143 persons. While the PIT counts have increased in the Gulf Coast region and other areas in Texas between 2017 and 2018 counts, the increase has been the highest in the Houston region. This increase in the number of homeless persons in the Houston area is assumed to be a direct impact of Hurricane Harvey. Almost one in five (18 percent) of unsheltered homeless individuals reported Hurricane Harvey as their reason for being homeless. It is important to note that the homeless count does not take into consideration those living in a temporary housing situation, such as staying with family or friends. The homeless count likely underestimates the total number of homeless persons.

Although few units of homeless housing were damaged due to Hurricane Harvey, there is a great need for additional resources for homeless housing and services since the disaster. First, the number of homeless persons has increased for the first time in seven years, as seen in the PIT Count. Second, some families and individuals who found temporary housing, such as those living with family or friends after Hurricane Harvey, are at risk of becoming homeless over the next year as their temporary housing becomes unavailable or inadequate. Finally, the housing market has tightened, leaving even fewer units than before available as housing for the homeless or those at-risk of becoming homeless.

### **3. Social Services: 2-1-1 Texas Program**

The United Way of Greater Houston operates the 2-1-1 helpline for the area. Between August 28 and October 10, 2017, 136,000 residents called 2-1-1, and a total of 51,596 unique callers requested service referrals due to the impact of Hurricane Harvey.<sup>7</sup> The month after the storm had the greatest number of calls with 21,233 in the first week declining to 1,801 for a week about one and a half months after the storm. Most calls requested referrals or information for Disaster Supplemental Nutrition Assistance Program (D-SNAP) and other food assistance, temporary financial aid, shelter, and disaster unemployment assistance.

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<sup>7</sup> Kinder Institute Research, November 2017, Map: 211 Calls During and After Harvey.  
<https://kinder.rice.edu/2017/11/09/map-211-calls-during-and-after-harvey/#.WgSOflWnGUl>

#### 4. Insurance

The Texas Department of Insurance (TDI) made a presentation to the Texas Senate Business and Commerce Committee in January 2018 about insurance and Hurricane Harvey. TDI compiled information from private insurers, Texas Windstorm Insurance Agency, and the Texas FAIR Plan for all personal and commercial lines of insurance, but this information was reported only by county. Although the City of Houston is in Harris, Fort Bend, and Montgomery counties, the majority of Houston's 2.2 million residents reside in Harris County. In this section, Harris County, including Houston, is used to represent the need in Houston, in the absence of Houston only information.

The following table includes information about Hurricane Harvey insurance claims in Harris County. Personal lines include homeowner's insurance, residential dwelling insurance, mobile homeowner's insurance, and personal automobile insurance. Other lines include other types of insurance like business, commercial, and crop insurance.

Table 4: Hurricane Harvey Insurance Claims for Harris County including Houston

	Number of Claims	Amount of Losses Paid	Amount of Losses Incurred
Personal Line of Insurance	234,168	\$1,136,071,404	\$1,556,882,087
Other Lines of Insurance	49,461	\$1,000,655,816	\$4,002,476,765

The Texas FAIR Plan Association (TFPA) provides limited coverage for one- and two-family residential dwellings, townhouse units, and condominium units that meet certain underwriting standards. TFPA provides residential property insurance to Texas residents in areas designated by the Commissioner of Insurance as underserved. TFPA policy counts grew 12 percent annual from 2010 to mid-2015, especially in the greater Houston area, as insurance companies reevaluated their exposure to catastrophes.

The following TFPA information from May 2018 is subset of the information reported from TDI. The total indemnity payments in Houston related to Hurricane Harvey, which are the losses paid or expected to be paid directly to an insured for first-party coverages, totaled over \$14 million. Paid expenses, which are expenses of adjusting claims that cannot be charged against specific claims, totaled over \$8 million. The average paid claim was \$1,106 in Houston.

Table 5: Texas FAIR Plan Association Claims in the City of Houston Related to Hurricane Harvey

	New Claims	Closed Claims	Open Inventory	Percent Closed	Paid Indemnity	Paid Expense	Average Paid
<b>Houston</b>	8,221	8,121	100	99%	\$14,857,961	\$8,345,920	\$1,106

Insurance is one way that many households begin to recover from a disaster. But, many Houstonians don't have insurance, and those that do may not have filed a claim or closed the claim without payment because the damage fell below the deductible or the damage was not covered by the policy.

## 5. National Flood Insurance Program

The following information was provided to Houston by FEMA in May 2018. Similar to the statewide National Flood Insurance Program (NFIP) claims, there was an increase in NFIP claims in Houston as a direct result of Hurricane Harvey. More than 882 (3 percent) of claims remained active/open with more than 21,374 (83 percent) claims closed. There are approximately 3,419 (13 percent) of claims that are closed without payment. The total assessed damage for NFIP claims was more than \$2.957 billion. In total, more than \$2.756 billion has been paid out on claims made during August to December 2017 with the average of all payments being \$107,359.

Table 6: NFIP Claims Filed in Houston by Date of Loss – City of Houston

	August	September	October	November	December	Total
Claims with Repetitive Loss	6,609	61	4	0	0	6,674
Total Claims	25,515	351	17	6	7	25,896

## 6. Texas Windstorm Insurance Association

For Houston, the impacts from Harvey were mostly from flooding, and because the wind intensity had subsided after Hurricane Harvey hit the coast of Texas, only a minimal number of households had damage due to wind. There were no Texas Windstorm Insurance Association (TWIA) claims in the City of Houston, as Houston falls outside of the coverage area.

## 7. Small Business Assistance (SBA) Disaster Home Loans

Homeowners and renters whose property was damaged by a declared disaster can apply for a Small Business Assistance (SBA) low-interest, disaster related home loan. The GLO provided SBA Disaster Home Loan data from January 28, 2018 to the City of Houston in May 2018. For the damaged properties in Houston, the total approved loan amount was \$718,372,700, and the total amount of applicants' verified loss was \$1,541,774,861.

## 8. Housing Assistance (PHA) Data

The Houston Housing Authority (HHA) provided the following information to the City of Houston in May 2018. Hurricane Harvey damaged approximately 18 percent of units owned by HHA. The following tables give details of Hurricane Harvey's impact to HHA properties.

Table 7: Houston Housing Authority Public Housing Damages

Public Housing	Total Number of Units	Number and Type of Units		Number of Damaged Units	Type of Damages in Damaged Units		Type of Damages in Common Areas/ Office/ Other	
		Public Housing	Tax Credit/ Market		Flood	Leaks	Flood	Leaks
Clayton Homes	296	296	0	112	112	0	0	0
Forest Green	100	100	0	84	84	0	1	1
Irvinton Village	318	318	0	23	10	13	0	0
Allen Parkway Village/HOA PV	500	500	0	80	0	80	1	4
Historic Rental Initiative	40	40	0	1	0	1	0	0
Bellerive	210	210	0	0	0	0	0	0
Cuney Homes	553	553	0	18	0	18	0	9
Ewing Apartments	40	40	0	0	0	0	0	0
Fulton Village	108	108	0	38	0	38	0	0
Heatherbrook	176	53	123	27	0	27	0	0
Kelly Village	270	270	0	0	0	0	0	1
Kennedy Place	108	108	0	17	0	17	0	2
Lincoln Park	250	200	50	27	0	27	0	0
Lyerly	199	199	0	0	0	0	0	0
Oxford Place	250	230	20	16	0	16	0	0
Victory	100	100	0	27	0	27	0	0
<b>Total</b>	<b>3,518</b>	<b>3,325</b>	<b>193</b>	<b>470</b>	<b>206</b>	<b>264</b>	<b>2</b>	<b>17</b>

Table 8: Houston Housing Authority Damages to Tax Credit Properties

Tax Credit Property	Total Number of Units	Number of Damaged Units	Type of Damages in Damaged Units		Type of Damages in Common Areas/Office/Other	
			Flood	Leaks	Flood	Leaks
2100 Memorial	197	197	0	TBD	1	0
Mansions at Turkey Creek	252	71	44	27	5	1
Sweetwater	260	73	0	73	0	0
Uvalde Ranch	244	74	74	0	1	0
Peninsula Park	280	52	0	52	0	0
Pinnacle	250	0	0	0	0	0
Villas at Winkler	234	172	0	172	0	0
Willow Park	260	0	0	8	0	0
<b>Total</b>	<b>1,977</b>	<b>6399</b>	<b>118</b>	<b>332</b>	<b>7</b>	<b>1</b>

Table 9: Houston Housing Authority Damages to Project Based Voucher Properties

PBV Property	Total Number of Units	Number of Damaged Units	Type of Damages in Damaged Units	
			Flood	Leaks
Long Drive	100	12	0	12
Telephone Road	200	0	0	0
<b>Total</b>	<b>300</b>	<b>12</b>	<b>0</b>	<b>12</b>

In summary, HHA had a total of 1,121 damaged units, and 392 families using tenant-based vouchers were displaced from their homes. After Hurricane Harvey, HHA inspected 910 housing units in the Housing Choice Voucher Program of which 392 units, or 47 percent of the housing units in the Housing Voucher Choice Program, failed inspection and the family had to move out. Furthermore, HHA has paid over \$1.2 million on 268 units at 17 properties for Housing for Harvey, a collaboration between the City, Harris County, and other partners to provide non-congregate shelter for Harvey impacted families. Due to the strain put on the Voucher Program, the housing authorities from Oklahoma City, Oklahoma, and Cambridge, Massachusetts have helped Houston by lending vouchers to Harvey-impacted families.

Table 10: Summary of Houston Housing Authority Current Damage Assessments

	Number of Displaced Families	Number of Units Damaged
Public Housing	206	470
Tax Credit	118	639
Multifamily Project Based Voucher	0	12
Tenant Based Voucher Families Displaced	392	392
<b>Total</b>	<b>716</b>	<b>1,513</b>



Besides damage to living quarters, many properties also had extensive damage to common areas and non-residential buildings (administrative, maintenance, etc.), which are essential to the functioning of a housing development. Total estimated amount of damages for Houston Housing Authority alone is about \$50 million. Damage to many units and buildings are extensive and will require reconstruction. Therefore, the unmet need estimates for repair underestimates the real need of rebuilding housing units that have been damaged repeatedly over the past several years.

Table 11: Estimated Repair Cost of Houston Housing Authority Public Housing Units

<b>Property</b>	<b>Estimated Repair Cost</b>
APV/HOAPV	\$464,000.00
Bellerive	\$5,000.00
Clayton Homes	\$14,445,300.00
Cuney Homes	\$55,000.00
Forest Green	\$3,972,146.75
Fulton Village	\$185,000.00
Heatherbrook	\$288,500.00
Historic Oaks	\$250,000.00
HHA	\$516,000.00
Irvinton Village	\$1,936,000.00
Kennedy Place	\$125,000.00
Lincoln Park	\$160,000.00
Oxford Place	\$85,000.00
Sweetwater Point	\$1,399,500.00
Victory Place	\$40,000.00
<b>Total</b>	<b>\$23,926,446.75</b>

Table 12: Estimated Repair Cost of Houston Housing Authority Tax Credit/Project Based Voucher Units

<b>Property</b>	<b>Estimated Repair Cost</b>
2100 Memorial	\$16,013,400.00
Long Drive	\$63,860.00
Mansions at Turkey Creek	\$3,644,500.00
Peninsula Park	\$59,500.00
Pinnacle on Wilcrest	\$11,500.00
Telephone Road	\$12,000.00
Uvalde Ranch	\$3,257,000.00
Villas on Winkler	\$2,383,500.00
Willow Park	\$15,595.00
<b>Total</b>	<b>\$25,460,855.00</b>

HHA has applied for Public Assistance in the amount of the damages illustrated above. The following calculation, prescribed by the GLO, shows the need for HHA.

Table 13: Public Assistance Total Cost and Need for Houston Housing Authority

<b>PA Category (Houston Housing Authority)</b>	<b>Approx. PA Cost</b>	<b>10 percent Local Match</b>	<b>15 percent Resiliency on Approx. Cost</b>	<b>Total Need (Local Match + Resiliency)*</b>
E – Buildings and Equipment	\$49,387,302	\$4,938,730	\$7,408,095	\$12,346,826
<b>Total</b>	<b>\$49,387,302</b>	<b>\$4,938,730</b>	<b>\$7,408,095</b>	<b>\$12,346,826</b>

\*The total need in this table does not reflect the actual needs of HHA because it does not take into account severe damage to some HHA properties that now need demolition and reconstruction.

The need for HHA is much greater than just the repair costs due to Hurricane Harvey damage. In addition to the impacts from Hurricane Harvey, some of HHA's units were impacted by flooding events in 2015 and 2016, as well. This has depleted many developments' reserves for repair. Due to flooding impacts, some developments may need to be reconstructed to prevent future flooding. These costs have not been included above. The unmet needs of public housing will be prioritized, and further information will be detailed in program guidelines.

## 9. FEMA Individual Assistance

FEMA Individual Assistance (IA) data from February 2, 2018, received from the GLO in May 2018, was used to quantify all housing applicants impacted by Hurricane Harvey. This information was then used to calculate the unmet needs for housing, based on the same methodology that the GLO used.

According to HUD, only the most impacted homes are to be included in calculations for unmet housing needs. Owner-occupied homes are determined to be most impacted if they have real property damage of \$8,000 or more. Rental units are determined to be most impacted if they have personal property damage of \$2,000 or more. The FEMA verified loss amount was used as a proxy for real property damage and personal property damage, as the data received from the GLO was limited to the FEMA verified loss. The following are the HUD determined categories of FEMA inspected most impacted homes.

### Owner-occupied Homes

- Major-Low: \$8,000 to \$14,999 of FEMA verified loss
- Major-High: \$15,000 to \$28,800 of FEMA verified loss
- Severe: Greater than \$28,800 of FEMA verified loss

### Renter-occupied Homes

- Major-Low: \$2,000 to \$3,499 of FEMA verified loss
- Major-High: \$3,500 to \$7,499 of FEMA verified loss
- Severe: Greater than \$7,500 of FEMA verified loss

To calculate the unmet housing need, the number of housing units determined as the most impacted are multiplied by the multiplier amount corresponding to that category. Houston used multipliers provided by HUD. These multipliers were determined using SBA estimated median repair costs in each of the Major-Low, Major-High, and Severe categories less assumed assistance from FEMA and SBA.

Table 14: Unmet Need Multiplier by Damage Category

<b>Category</b>	<b>Multiplier Amount</b>
Major-Low	\$58,956
Major-High	\$72,961
Severe	\$102,046

Approximately 258,437 applicants in Houston applied to FEMA for assistance. This is approximately 28.8 percent of the total applicants for FEMA assistance in Texas. Almost 20 percent of all owner applicants in Texas were in Houston, and almost 38 percent of all the renter applicants in Texas were in Houston. Of the total number of applicants in Houston, 75,887 had a FEMA value loss (FVL) over \$0, which is 26 percent of those applicants with FVL over \$0 in Texas.

The total number of owner-occupied applicants in Houston with over \$8,000 in FVL is 22,476. The total number of renter applicants in Houston with over \$2,000 in FVL is 14,878. Over half (51 percent) of the owner applicants received a FVL over \$0, which is much higher than the number of renter applicants receiving a FVL over \$0, at only 18 percent. This may indicate that renter needs are under-represented in FEMA IA estimates.

Table 15: Total IA Applications in the City of Houston

<b>Occupancy Type</b>	<b>Total Applications</b>	<b>FEMA Verified Loss (FVL) Over \$0</b>	<b>Applicants with Unmet Need</b>
Owner	88,282	45,084	22,476
Renter	168,723	30,765	14,878
N/A	1,432	28	0
<b>Total</b>	<b>258,437</b>	<b>75,877</b>	<b>37,354</b>

### a. Total Unmet Need

The following table provides a breakdown of total unmet needs for owner- and renter-occupied households using GLO's methodology to calculate unmet need. It provides the damage category and the total count of unmet need for those three categories as previously defined.

Table 16: Category of Unmet Needs by Owner-Occupied and Renters for City of Houston

Damage Category/ Multiplier	Total Count	Total Owner-Occupied and Rental Unmet Needs	Owner-Occupied Count	Total Owner Occupied Unmet Need	Rental Count	Total Rental Unmet Needs
Major-Low: \$58,956	12,598	\$742,727,688	7,392	\$435,802,752	5,206	\$306,924,936
Major-High: \$72,961	18,364	\$1,339,855,741	10,370	\$756,605,570	7,994	\$583,250,234
Severe: \$102,046	6,392	\$652,278,032	4,714	\$481,044,844	1,678	\$171,233,188
<b>Total</b>	<b>37,354</b>	<b>\$2,734,862,524</b>	<b>22,476</b>	<b>\$1,673,453,166</b>	<b>14,878</b>	<b>\$1,061,408,358</b>

As defined by the table, the owner-occupied unmet need in dollars is \$1.67 billion (61 percent) and the renter unmet need is \$1.06 billion (39 percent), resulting in a total unmet need of \$2.73 billion.

Approximately 49 percent of the unmet need population is in the LMI category. The unmet need for the LMI population is over \$1.3 billion. The unmet need by income category for Houston applicants can be seen in the following table.

Table 17: Unmet Need by Income Category/Owner-Occupied and Renter for City of Houston

Income Category	Count	Unmet Need	Percent of Count	Percent of Unmet Need
0-30%	8,723	\$619,561,377	23%	23%
31-50%	4,575	\$322,882,375	12%	12%
51-80%	5,480	\$388,017,580	15%	14%
Above 80%	12,964	\$987,774,019	35%	36%
Not Reported	5,612	\$416,632,607	15%	15%
<b>Total</b>	<b>37,354</b>	<b>\$2,734,861,524</b>	<b>100%</b>	<b>100%</b>

## b. Owner Occupied Unmet Need

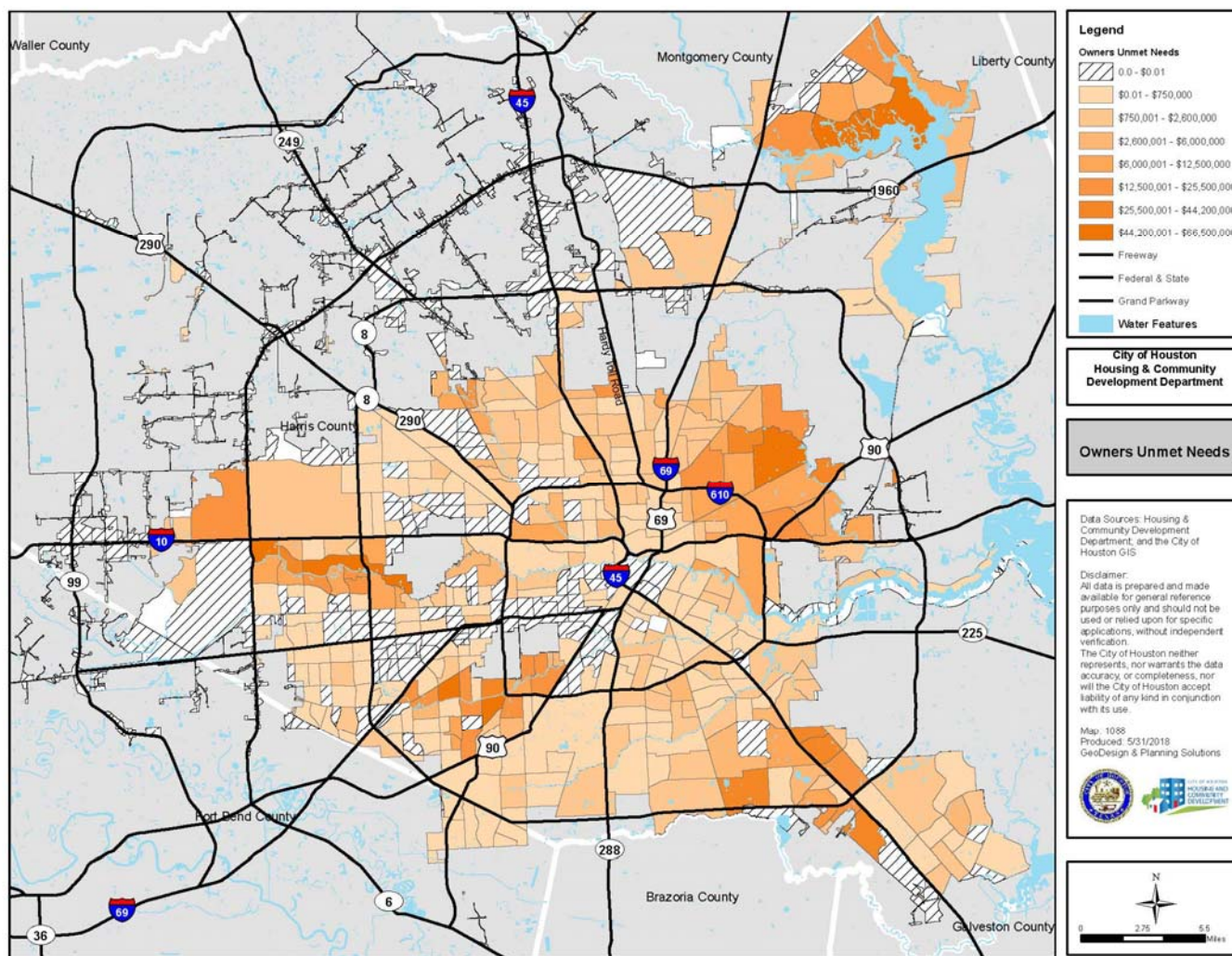
Approximately 35 percent of the owner-occupied unmet need is in the LMI category. For owners, the unmet need for the LMI population is over \$596 million. The unmet need by income category for owner-occupied households for Houston can be seen in the following table. Findings from this data have helped Houston better develop programs for homeowners, such as Homeowner Assistance, Single Family Development, Homebuyer Assistance, and Housing Buyout.

Table 18: Owner Unmet Need by Income Category for City of Houston

<b>Income Category</b>	<b>Count</b>	<b>Unmet Need</b>	<b>Percent of Count</b>	<b>Percent of Unmet Need</b>
0-30%	3,194	\$222,356,274	14%	13%
31-50%	2,230	\$156,016,730	10%	9%
51-80%	3,095	\$217,915,740	14%	13%
Above 80%	10,428	\$806,736,918	46%	48%
Not Reported	3,529	\$270,427,504	16%	16%
<b>Total</b>	<b>22,476</b>	<b>\$1,673,453,166</b>	<b>100%</b>	<b>100%</b>

The following map shows this unmet need for owners in the City of Houston by census tract.

Figure 4: Owner Unmet Need by Income Category for City of Houston



### c. Renter Occupied Unmet Need

The percentage of renter households within LMI categories was analyzed and approximately 69 percent of the unmet need is in the less than 80 percent LMI category. The unmet need for the LMI population is over \$734 million for renters. The unmet need by income category for renters in Houston is illustrated in the following table. This information informed the Multifamily Rental Program and the Small Rental Program, which are designed to provide funds for rehabilitation, reconstruction, and new construction of affordable rental homes for residents or in areas impacted by Hurricane Harvey. It also informed the Single Family Development and Homebuyer Assistance Programs, as some renters may transition into homeownership.

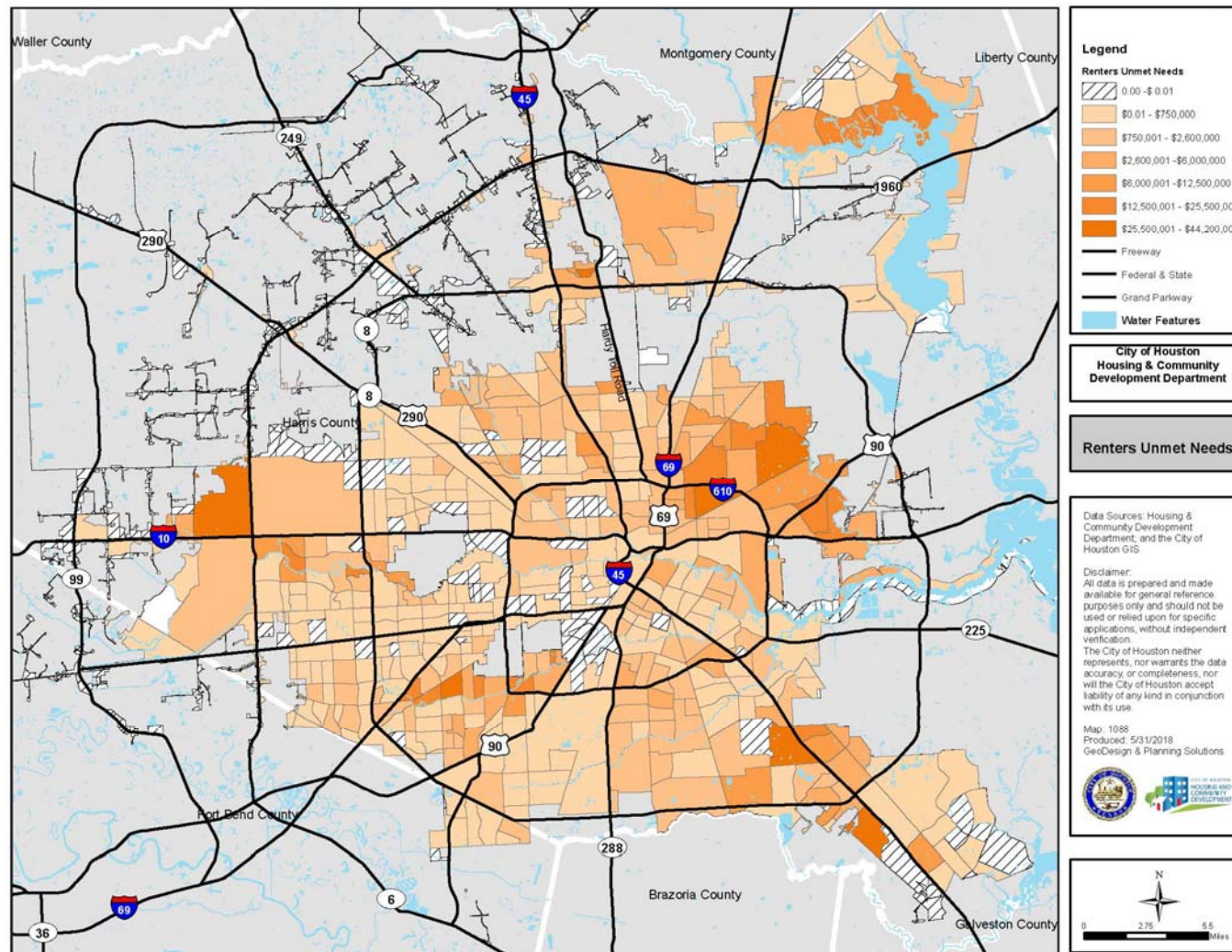
Table 19: Renter Unmet Need by Income Category for City of Houston

<b>Income Category</b>	<b>Count</b>	<b>Unmet Need</b>	<b>Percent of Count</b>	<b>Percent of Unmet Need</b>
0-30%	5,529	\$397,198,669	37%	37%
31-50%	2,345	\$166,865,645	16%	16%
51-80%	2,385	\$170,101,840	16%	16%
Above 80%	2,536	\$181,037,101	17%	17%
Not Reported	2,083	\$146,205,103	14%	14%
<b>Total</b>	<b>14,878</b>	<b>\$1,061,408,358</b>	<b>100%</b>	<b>100%</b>

The following map shows this unmet need for renters in the City of Houston by census tract.



Figure 5: Renter Unmet Need by Income Category for City of Houston



#### d. Total Unmet Need Using HUD's Methodology

As required by the Federal Register, Vol. 83, No. 28, February 9, 2018, grantees are prohibited from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if the combined households income is greater than 120 percent Area Median Income (AMI) or the national median, the property was located in a floodplain at the time of the disaster, and the property owner did not maintain flood insurance on the damaged property, even when the property owner was not required to obtain and maintain such insurance.

HUD, through the Federal Register, indicates how to calculate unmet need for owners and renters. HUD specifies that owners have an unmet need if they have a real property flood value loss of \$8,000 or greater and either 1) live outside of a floodplain without flood insurance or 2) live inside a floodplain without flood insurance and have a household income of less than 120% AMI. HUD identifies renters with an unmet need as those households with a personal property flood value loss of greater than \$2,000 and have a household income less than 50% AMI. The dollar amounts used are for HUD's calculation of unmet need and do not impact eligibility of the program.

The following table provides a breakdown of owners in a floodplain with no flood insurance by income category. The number of IA FEMA applicants that show an unmet need totals 37,354. The total number of most impacted owners that are in a floodplain with no flood insurance totals 2,994 (8 percent). Most owners living in the floodplain without insurance are families making below 120% AMI, with the total number households above 120% AMI at 520 and the total of owners below 120% AMI at 1,980.

Table 20: Owners in a Floodplain with No Flood Insurance by Income Category

<b>Income Category</b>	<b>Count</b>	<b>Unmet Need</b>	<b>Percent of Count</b>	<b>Percent of Unmet Need</b>
0-30%	659	\$47,052,274	22%	22%
31-50%	425	\$30,405,015	14%	14%
51-80%	560	\$40,055,395	19%	18%
81-120%	336	\$24,031,081	11%	11%
Above 120%	520	\$39,942,135	17%	18%
Not Reported	494	\$37,423,554	17%	17%
<b>Total</b>	<b>2,994</b>	<b>\$218,909,454</b>	<b>100%</b>	<b>100%</b>

#### 10. City of Houston's Floodplain Management Office

The City of Houston's Floodplain Management Office is responsible for administering the provisions in the City's Floodplain Ordinance, which includes making determinations regarding substantially damaged buildings in the 100-year floodplain in the city limits of Houston. A home is considered substantially damaged when the cost to repair it is more than 50 percent of the market value of the home. As of May 2018, approximately 1,944 homes in Houston were considered substantially damaged.

The City will not issue permits for repairs to homes considered to be substantially damaged unless the owner demonstrates how the home will be in compliance with the City's Floodplain Ordinance. To comply, these homes must be elevated or reconstructed at a higher elevation. Although substantially damaged homes may have received assistance from FEMA or other sources, because there are additional requirements from the City, for safety reasons, there is an additional unmet need for these property owners who must elevate or rebuild, rather than just repair damages.

### **11. Harris County Flood Control District Home Buyout Program**

The Harris County Flood Control District (HCFCD) is a special purpose district that provides flood damage reduction projects in Harris County, including in the City of Houston. HCFCD administers a Home Buyout Program to reduce flood damages by purchasing and removing homes located several feet deep in the floodplain where flood damage reduction projects are not cost effective or beneficial. HCFCD has 24 Buyout Areas of Interest within the city limits of Houston, where homes are considered hopelessly deep in the floodplain. Once these homes are purchased, HCFCD will demolish the homes and keep the areas for flood mitigation. As of May 2018, there are 2,033 privately owned parcels within these 24 areas. Of these, there are 1,398 parcels with structures and 629 parcels are vacant lots. There is a need to purchase these parcels to remove these households from areas that are flooding hazards.

### **12. Summary of Housing Unmet Need**

The City of Houston is still analyzing the best available data to determine unmet housing need. Based on the information in this section, the City of Houston is showing a need that is much more than the City's current allocation of CDBG-DR funds. The City is working with consultants to analyze more detailed data from a variety of sources. The analysis will be available at a later date and will be considered during the development of program guidelines.

## G. Infrastructure Impact

Hurricane Harvey has impacted Houston's infrastructure and caused damage to water system facilities, roads, bridges, and parks. In addition to direct damage to infrastructure caused by flooding, aging or under-sized infrastructure can also lead to flooding in residential homes and other structures. Houston Public Works (HPW) has inspected various infrastructure systems in the city since Harvey and continues to monitor these systems and facilities for needed repairs. Additional assessments of the infrastructure system are planned in the future. These assessments will include mitigation needed to protect from damages caused by future flooding events and adaptation for future infrastructure.

Like the GLO, Houston has prioritized housing unmet need in this Action Plan. The City anticipates receiving additional federal funds in 2019, specifically additional CDBG-DR funds as referenced in Public Law 115-123, to address a variety of activities related to mitigation, which is anticipated to be used to address a variety of unmet needs including infrastructure.

### 1. FEMA Public Assistance

The FEMA Public Assistance (PA) data is the best available data set to determine infrastructure need after Hurricane Harvey. The City of Houston used the GLO's methodology to calculate infrastructure unmet need by adding the local match and resiliency cost of projects assisted through FEMA's Public Assistance. The Local Match is 10 percent of the approximate public assistance cost and Resiliency is 15 percent of the approximate public assistance cost. The following PA cost estimates and unmet need calculations are based on data from the FEMA Grants Portal Damage Inventory on December 4, 2017.

Table 21: Total Cost and Need by Public Assistance Category for City of Houston

PA Category (City of Houston)	Approx. PA Cost*	10 percent Local Match	15 percent Resiliency on Approx. Cost	Total Need (Local Match + Resiliency)
A – Debris Removal	\$259,459,255	\$25,945,926	\$38,918,888	\$64,864,814
B – Emergency Protective Measures	\$140,307,363	\$14,030,736	\$21,046,104	\$35,076,840
C – Roads and Bridges	TBD	TBD	TBD	TBD
D – Water Control Facilities	TBD	TBD	TBD	TBD
E – Buildings and Equipment	\$78,467,346	\$7,846,735	\$11,770,102	\$19,616,837
F – Utilities	\$80,560,302	\$8,056,030	\$12,084,045	\$20,140,075
G – Parks, Recreational Facilities, and Other Items	\$32,000,000	\$3,200,000	\$4,800,000	\$8,000,000
Z. Direct Administrative Costs	TBD	TBD	TBD	TBD

\*Costs based on 12/4/17 data for the FEMA Grants Portal Damage Inventory. Total Public Assistance is estimated to be \$2.4 billion.

As of the end of May 2018, the City of Houston had received \$163,016,399 from FEMA for two PA categories, A – Debris Removal and B – Emergency Protective Measures. It is anticipated that in the future the City of Houston will submit additional damages for FEMA PA grant assistance in the following categories: C – Roads and Bridges, D – Water Control Facilities, and Z – Direct Administrative Costs. It is estimated the total Public Assistance costs will be 2.4 billion. The total need in the PA category of \$147,698,568 is an underestimation of the total infrastructure need in Houston.

The City has also received \$100 million in insurance proceeds, which will be used to address damage to City owned buildings and assets caused by Hurricane Harvey. An apportionment and allocation methodology was submitted to FEMA on May 29, 2018, and upon approval, these proceeds will be used for City facility repairs and business interruption reimbursements. In addition, the City received a grant award from the Office of the Governor in the amount of \$50 million. These funds are budgeted for local, non-federal cost share of debris removal cost for Category A FEMA Public Assistance for \$25 million, the purchase of additional flood insurance for \$10 million, and deductible payments on current insurance policy for damage to municipal property for \$10 million.

## 2. Texas Hazard Mitigation Grant Program (HMGP)

The City of Houston has submitted Notice of Intents to the state HMGP for various mitigation projects with an estimated total cost of \$703 million. These projects include constructing detention basins and diversion channels; reconstructing streets and utilities; removing structures from the floodplain through buyouts, elevations, and rebuilding; and dredging of waterways. The City will be submitting full applications for these projects soon. The HMGP provides assistance for 75 percent of the project cost and requires a local match for the remaining costs. This means that Houston will have to provide a match of or has an unmet need of approximately \$175 million for infrastructure mitigation projects.

Table 22: Total Cost of HMGP Projects for City of Houston

	Cost	Funding Source	Unmet Need (25% Local Match)
Hazard Mitigation Projects	\$703,000,000	FEMA-HMGP	\$175,750,000

## 3. Summary of Infrastructure Unmet Need

The current estimated infrastructure unmet need for Houston, as calculated by the method suggested by GLO, is \$198,448,568. This does not include all infrastructure unmet need in Houston related to Hurricane Harvey.

Houston's unmet infrastructure need also includes a variety of unfunded but needed infrastructure projects. This includes unfunded local drainage projects that are crucial to reducing damage from future flooding in Houston's neighborhoods. These projects are identified through a data-driven analysis of the storm water infrastructure in the city. These drainage projects are critical to improving storm water drainage systems in local neighborhoods and are one component to

achieving resiliency in Houston's neighborhoods and reducing flood risks to homes and businesses.

In addition, the City of Houston is looking at ways to upgrade its infrastructure systems, and not just repair infrastructure that will likely get damaged again in a future flood event. One example is the wastewater consolidation projects, which will remove wastewater lift stations above ground and construct new underground infrastructure through gravity-fed pipes. Local communities want to remove damaged lift stations from their neighborhoods. These wastewater consolidation projects will not only help these neighborhoods eliminate lift stations from their surroundings but will also provide more resilient underground infrastructure.

The City continues to further assess its infrastructure and determine ways to incorporate mitigation and resilience strategies to protect the current infrastructure from and also adapt infrastructure to future flooding events.

## H. Economic Impact

Houston's economy is the 6<sup>th</sup> largest in the country and is expected to double its current GDP by 2040 with an estimated GDP growth rate of 3.1 percent<sup>8</sup>. According to the Texas Workforce Commission, the unemployment rate for the City of Houston in April 2018 was 4.2 percent. The industries that employ the greatest number of people are educational services, health care and social assistance (18.9 percent); professional, scientific, and management (14.4 percent); construction (10.2 percent); and retail trade (10.5 percent) followed by arts, entertainment and recreation (9.7 percent); manufacturing (8.6 percent); transportation and warehousing (5.6 percent); and other services (6.1 percent). Overall, Houston's economy was robust before Harvey and is expected to continue to remain strong through the recovery from Harvey.

Houston's economy was impacted by the recent energy industry downturn and by several flooding disasters, including Hurricane Harvey in 2017. Since the Houston metropolitan area is rapidly growing and the city has a robust economy, Hurricane Harvey is not expected to cause a major economic downturn in Houston. However, job creation, as reported in March 2018, has fallen below the long-term average for the month of March<sup>9</sup>. Even though the unemployment rate was lower than the rate from previous years at 4.1 percent after Harvey, the labor force has shrunk by 31,900 from May 2015 to February 2017<sup>10</sup>.

### 1. Employment

Most of Houston's employment growth in the past decade can be attributed to the following four sectors: health care and social assistance; leisure and hospitality; professional and business services; and trade, transportation and utilities. Jobs in the health care sector and professional and business services sectors are well-paying but also require advanced degrees or specialized trainings that are usually out of reach for the low- and moderate-income individuals. Jobs in the leisure and hospitality sector and trade, transportation and utilities sector do not necessarily require advanced degrees or specialized training but also have lower median wages. The impact on wages and employment in these sectors after Harvey is still under investigation. However, based on active claimants for unemployment benefits filed in October 2017, approximately 6,182 individuals lost their jobs and filed for unemployment benefits in the City of Houston. In January 2018, the number of active claimants for unemployment benefits was reduced to approximately 5,156.

### 2. Small Business Administration (SBA) Business Disaster Loans

The GLO provided Small Business Assistance (SBA) business disaster loan data from January 28, 2018 to the City of Houston in May 2018. Businesses of all sizes as well as private, non-profit organizations, are eligible for SBA business disaster loans. Loans can be used to repair or replace disaster-damaged property owned by the business.

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<sup>8</sup> Greater Houston Partnership (2017). Houston's Economy.

[http://www.houston.org/pdf/research/quickview/Most\\_Current\\_Talking\\_Points.pdf](http://www.houston.org/pdf/research/quickview/Most_Current_Talking_Points.pdf)

<sup>9</sup> Greater Houston Partnership. (May 2018). *The Economy at A Glance Houston*. Retrieved from

[http://www.houston.org/pdf/research/quickview/Economy\\_at\\_a\\_Glance.pdf](http://www.houston.org/pdf/research/quickview/Economy_at_a_Glance.pdf)

<sup>10</sup> Greater Houston Partnership. (December 2017). *Economic Highlights, 2017*. Retrieved from <http://www.houston.org/assets/pdf/economy/Economic-Highlights-2017-web.pdf>



The total verified loss for real estate totaled more than \$1.2 billion and the total verified loss of business content was more than \$146 million in Houston. The total combined business verified loss in Houston was over \$1.4 billion for Hurricane Harvey. The SBA has approved over \$271 million, as of January 2018. The remaining amount of loss totals over \$1.1 billion. Following the methodology used by the GLO, the City uses the remaining amount of loss totals as the preliminary unmet need for businesses impacted by Hurricane Harvey.

### **3. Infrastructure Conclusion**

Overall, the Houston economy is strong post-Harvey. However, the economy of certain neighborhoods, such as those with flooded homes that remain vacant, may continue to see impacts with fewer residents in the area for business or retail. Some neighborhoods have real estate values that have plummeted, while in others it has increased. Recovery in some neighborhoods will take many years. Economic recovery also differs from household to household. Individuals with lower educational attainment or employment skills may be less resilient than others to recover from a major storm event. So, although the economy is strong at the macro level, many households struggle to recapture what they had before Hurricane Harvey because of a lost job, lost pay, or lost property, and they do not have the ability to increase their income to cover the cost of their recovery.

In addition, Hurricane Harvey has affected certain sectors more than others, such as the construction industry. With damaged homes in need of repair, elevation, or reconstruction, there has been a significant increase in construction demand, beginning in the fall of 2017. This demand has led to a labor shortage and higher costs for residents in need of home repair. The community input received so far has confirmed the struggle for families in finding reasonably priced contractors to complete needed repairs on their flood-damaged properties in a timely manner.

Policy changes spurred by Hurricane Harvey's impacts on life and property may also impact the economy. In April 2018, Houston City Council approved a rule for new home and other building developments in the floodplain to be elevated above a certain level. Many argued against this change saying it may drive up prices and stifle development. The new policy comes into effect on September 1, 2018, and any impacts are yet to be determined. If other City or State rules are passed in response to Harvey impacts, these may also have effects on Houston's economy.

### **III. Houston Disaster Recovery Program**

#### **A. Direct Allocation**

Because the City of Houston and Harris County have been awarded a direct allocation from the State, the GLO directed each to develop a local action plan. Houston has followed GLO's guidance in submitting a local action plan, which is incorporated into various sections of the GLO's Action Plan. The local information in the City's action plan includes local needs assessment, connection to unmet needs, local programs and requirements, local consultation, and expenditure timelines.

#### **B. Connection to Unmet Needs**

The entire City of Houston is located in an area HUD identified as "most impacted and distressed". Therefore, 100 percent of funds spent in Houston will address the unmet needs of the most impacted and distressed areas in Texas. The GLO's assessment and the City's local assessment of unmet needs are the basis for the development and prioritization of recovery activities in Houston. The City has consulted with affected citizens, stakeholders, and the Houston Housing Authority to assess needs. As additional data becomes available and as additional community and stakeholder engagements take place, the unmet needs and activities to address them through CDBG-DR funds may be updated.

Through these funds, Houston primarily intends to address unmet housing needs with approximately 90 percent of funds addressing unmet needs directly related to housing. Using available data and input from stakeholders and residents, the City has developed the following housing programs: Homeowner Assistance Program, Single Family Development Program, Multifamily Rental Program, Small Rental Program, Homebuyer Assistance Program, and Buyout Program. The programs will address the long-term recovery of housing in Houston as efficiently as possible.

One third of these funds are allocated to assist homeowners through the repair, rehabilitation, and reconstruction of their homes. Almost one third of the funds will also be used to repair, rehabilitate, reconstruct, or develop new rental homes, both multifamily and single family. The remaining housing funds, available to assist both renters and homeowners, will be used to build new, affordable single family homes, assist homebuyers in purchasing homes, and removing residents from homes in areas that are likely to flood again.

Houston's CDBG-DR funds will primarily address unmet housing needs. However, the City recognizes that a comprehensive and effective long-term recovery program involves a broader approach. Houston's housing programs will be complemented with public service activities to help stabilize families or prepare families for permanent housing solutions. Public service activities may include, but are not limited to, homeless prevention and services, housing counseling, legal counseling, job training, mental health, and general health services. The City has also developed an Economic Revitalization Program to create and retain jobs in the community, helping households stabilize through employment or by increasing their income.

The City has allocated two percent for planning activities to support and promote a comprehensive long-term recovery effort that will tie into the regional planning efforts, as appropriate. The City will allocate two percent of housing programs for housing administrative costs, as allowed by the GLO. These costs will include compliance monitoring and other administrative activities to support the housing programs. At least 70 percent of all program funds will benefit low- and moderate-income persons.

The City has included preparedness and mitigation measures into this analysis to ensure that Houstonians are safer and more resilient than they were before Hurricane Harvey and can recover faster when future disasters occur. The City will strive to incorporate preparedness and mitigation measures into its activities. These efforts will be detailed in program guidelines as they are developed. In addition, the City will use these funds and design its programs with the goal of increasing affordability and equity within Houston.

A summary of Houston's unmet need is identified in the table below. This information is both a subset of and additional information for the GLO's Summary of Total Unmet Need.

Table 23: Summary of Total Unmet Need

Category	Losses/Gap	CDBG-DR Investments*	Other Known Investments	Remaining Unmet Need
<b>Housing</b>	<b>\$5,741,049,341</b>	<b>(\$1,054,177,859)</b>	<b>(\$2,381,348,572)</b>	<b>\$2,312,931,006</b>
Owner-Occupied Housing	\$1,673,453,681	(\$358,028,859)		\$1,315,424,822
National Flood Insurance Program	\$2,956,800,000		(\$2,336,900,000)	\$619,900,000
Renter-Occupied Housing	\$1,061,408,358	(\$374,984,000)		\$686,424,358
FEMA Public Assistance – Houston Housing Authority	\$49,387,302		(\$44,448,572)	\$12,346,826
Houston Single Family Development and Homebuyer Assistance Programs		(\$221,165,000)		(\$221,165,000)
Houston Buyout Program		(\$40,000,000)		(\$40,000,000)
Houston Public Services		(\$60,000,000)		(\$60,000,000)
<b>Infrastructure</b>	<b>\$1,293,794,266</b>	<b>\$0</b>	<b>(\$1,183,964,839)</b>	<b>\$198,448,566</b>
FEMA Public Assistance	\$590,794,266		(\$531,714,839)	\$147,698,566
HMGP Projects	\$703,000,000		(\$527,250,000)	\$175,750,000
Insurance Proceeds and Office of the Governor's Grant			(\$125,000,000)	(\$125,000,000)
<b>Economic</b>	<b>\$1,401,319,818</b>	<b>(\$60,000,000)</b>	<b>(\$271,205,500)</b>	<b>\$1,070,114,318</b>
SBA Business/EIDL Loans	\$1,401,319,818		(\$271,205,500)	\$1,130,114,318
Houston Economic Revitalization Program		(\$60,000,000)		(\$60,000,000)

\* CDBG-DR investments include activity delivery costs.

### C. Houston Program Budget

Table 24: Total Allocation Budget – City of Houston

Program		HUD Most Impacted Areas (80%)	State Most Impacted Areas (20%)	LMI Amount (70% of Total Allocation)	Total	% of Total Allocation by Program	% of Total Allocation	Total
Direct Programs	City of Houston	\$ 1,155,119,250	-	\$ 808,583,475	\$ 1,155,119,250	22.99%	45.19%	\$ 2,270,506,080
	Harris County	\$ 1,115,386,830	-	\$ 780,770,781	\$ 1,115,386,830	22.20%		
Direct Allocation Subtotal		\$ 2,270,506,080	-	\$ 1,589,354,256	\$ 2,270,506,080			
State Programs	State of Texas	\$ 2,202,967,136	\$ 550,741,784	\$ 1,654,496,406	\$ 2,753,708,920	54.81%	54.81%	\$ 2,753,708,920
State Allocation Subtotal		\$ 2,202,967,136	\$ 550,741,784	\$ 1,654,496,406	\$ 2,753,708,920			
City of Houston Programs								
City of Houston Housing	Homeowner Assistance Program	\$ 385,028,859	-	\$ 269,520,201	\$ 385,028,859	7.66%	20.73%	\$ 1,041,754,416
	Single Family Development Program	\$ 200,000,000	-	\$ 140,000,000	\$ 200,000,000	3.98%		
	Multifamily Rental Program	\$ 314,979,000	-	\$ 220,485,300	\$ 314,979,000	6.27%		
	Small Rental Program	\$ 60,005,000	-	\$ 42,003,500	\$ 60,005,000	1.19%		
	Homebuyer Assistance Program	\$ 21,315,000	-	\$ 14,920,500	\$ 21,315,000	0.42%		
	Buyout Program	\$ 40,000,000	-	\$ 28,000,000	\$ 40,000,000	0.80%		
	Housing Admin	\$ 20,426,557	-	\$ 14,298,590	\$ 20,426,557	0.41%		
City of Houston Public Services and Economic Revitalization	Public Services	\$ 60,000,000	-	\$ 42,000,000	\$ 60,000,000	1.19%	1.80%	\$ 90,264,834
	Economic Revitalization Program	\$ 30,264,834	-	\$ 21,185,384	\$ 30,264,834	0.60%		
City of Houston Planning	Houston Planning	\$ 23,100,000	-	\$ 16,170,000	\$ 23,100,000	0.46%	0.46%	\$ 23,100,000
City of Houston Allocation Subtotal		\$ 1,155,119,250	-	\$ 808,583,475	\$ 1,155,119,250			
Grand Total Allocation		\$ 4,473,473,216	\$ 550,744,784	\$ 3,243,850,662	\$ 5,024,215,000	100%	100%	\$ 5,024,215,000

## D. Use of Funds

Program Guidelines: HCDD will develop program guidelines that provide operational details on eligibility requirements, reporting requirements, and other program information. All program guidelines will be approved by the GLO and posted for public comment, before use. These programs will help accomplish actions set forth in the City's Analysis of Impediments by persevering and expanding housing and economic opportunities in Houston. Program guidelines will be developed in ways that will address fair housing impediments and promote a recovery that is equitable.

Affirmative Marketing Outreach Plan: HCDD is committed to affirmatively furthering fair housing through established affirmative marketing policies. Affirmative marketing efforts will include an affirmative marketing plan, based on the U.S. Department of Housing and Urban Development (HUD) regulations. The goal is to ensure that outreach and communication efforts reach eligible homeowners and renters from all racial, ethnic, national origin, religious, familial status, the disabled, "special needs", and gender groups. The outreach plan will give detailed information about how the City plans for effective outreach to all groups of homeowners and renters mentioned above, as well as how the application and enrollment process for programs will be suitable for persons with limited English proficiency, persons with disabilities, and those with special needs.

### 1. Homeowner Assistance Program

HCDD will provide five program options to assist eligible homeowners with their rehabilitation and reconstruction needs. This includes City Managed Rehabilitation and Reconstruction, Reimbursement, Acquisition, Homeowner Managed Rehabilitation, and Interim Mortgage Assistance. The City will select the option(s) available for each homeowner based on where they are in the recovery process and the condition of their home. Program options are as follows:

***City Managed Rehabilitation and Reconstruction:*** The City will manage and complete the construction process for the rehabilitation or reconstruction of damaged homes on behalf of homeowners. The City anticipates contracting with a firm(s) to provide design and construction services for the rehabilitation or reconstruction of damaged properties.

***Reimbursement:*** Homeowners who have completed partial or full repairs on their home before applying to the program may be eligible for reimbursement of eligible expenses incurred, prior to application to the program, for work performed to minimum program standards, following an environmental clearance. Xactimate or similar industry standard tool will be used to ensure cost reasonableness and the work will be verified through an on-site inspection by program staff.

***Acquisition:*** The City may elect to voluntarily acquire single family homes for rehabilitation or reconstruction in conjunction with its Single Family Development Program. Alternatively, the City may provide a homeowner the option to exchange their storm-damaged home for a newly constructed home. The home acquired through exchange may then be rehabilitated or reconstructed through the program. These homes would then

be offered for sale to LMI homebuyers or for exchange to another homeowner with a damaged home.

***Homeowner Managed Rehabilitation:*** The City will assist homeowners to manage their own rehabilitation process and will provide construction advisory services for these homeowners. Homeowners will select their own licensed and insured contractor(s) and contract verifications will be performed for all contractors. Xactimate or similar industry standard tool will be used to ensure cost reasonableness and the work will be verified through an on-site inspection by program staff. Homeowner managed rehabilitation will only be available to homeowners who have initiated the repair process and are under contract with a contractor at the time of application. Program guidelines will fully address program details, including minimum construction standards, environmental compliance, program controls, and circumstances under which this option may be provided.

***Interim Mortgage Assistance:*** Interim Mortgage Assistance may be provided to homeowners being served under the Homeowner Assistance Program who are making both a mortgage payment on their storm-damaged home and making a rental payment for their temporary home. These homeowners may be eligible to receive up to 20 months of assistance based on the lesser of their monthly mortgage and temporary rental housing payments. This option may be considered when the rehabilitation or reconstruction of a home extends beyond 3 months, during which mortgage payments may be due, but the home remains uninhabitable. This assistance will help to ease the financial hardship homeowners may face during the post disaster recovery period and prevent homeowners from going into foreclosure. Determination of reasonable and necessary award amounts, including duplication of benefits calculation, retroactive eligibility, and specific performance milestones for the rehabilitation/reconstruction of homes, will be established in the program guidelines.

- a. Allocation Amount: \$385,028,859
- b. Maximum Assistance:
  - i. Rehabilitation: Local composite builder bid amount and not greater than \$80,000 per unit. This exceeds GLO's amount because it is anticipated that Houston will have a higher proportion of homeowners with larger homes with higher median home values, that have remaining unmet need and also have a need for repair and not reconstruction, compared to other impacted areas in the state.
  - ii. Reconstruction: Local composite builder bid amount based on procured builders and the builder's house plans based on household size.
- c. Eligible Activities: Housing activities allowed under CDBG-DR; HCDA Section 105(a)(1), 105(a)(3-4), 105(a)(8) 105(a)(11), 105(a)(18), and 105(a)(25), 24 CFR 570.201(g) including but are not limited to:
  - i. Single family owner-occupied rehabilitation and reconstruction
  - ii. Hazard mitigation
  - iii. Relocation assistance
  - iv. Demolition only

- v. Other activities associated with the recovery of impacted single family housing stock
  - vi. Payment of non-federal share
- d. Ineligible Activities:
- i. Forced mortgage payoff
  - ii. Incentive payments to households that move to disaster-impacted floodplains
  - iii. Properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for rehabilitation assistance or housing incentives
  - iv. Rehabilitation/reconstruction of homes located in the floodway
  - v. Rehabilitation/reconstruction of a home where:
    - 1. the combined household income is greater than 120 percent AMI or the national median,  
and
    - 2. the property was as located in a floodplain at the time of the disaster,  
and
    - 3. the property owner did not maintain flood insurance on the damaged property, even when the property owner was not required to obtain and maintain such insurance
  - vi. Assistance for the repair, replacement, or restoration of a property to a person who has failed to meet Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a), which states that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for “repair, replacement, or restoration” for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditional on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required. under applicable Federal law on such property.
- e. Eligibility Criteria for Assistance:
- Property
- i. Not located in a floodway
  - ii. Owner-occupied at the time of the storm
  - iii. Served as homeowner’s primary residence
  - iv. Sustained damage from Hurricane Harvey
  - v. Environmentally cleared
- Homeowner
- i. All homeowner applicants and co-applicants must be current on payments for child support;
  - ii. Homeowner applicants must furnish evidence that property taxes are current, under an approved payment plan, or that they have an exemption under current laws;
  - iii. Homeowner applicants must agree to a limited subrogation of any future awards related to Hurricane Harvey, to ensure duplication of benefits compliance.



- iv. Assistance will be provided in the form of a zero-interest forgivable loan. Homeowner applicants are required to maintain principal residency in the assisted property throughout the length of the affordability period. Cash-out refinancing, home equity loans, or any loans utilizing the assisted property as collateral are not allowed during the affordability period. A violation of this policy will activate the loan repayment terms.
  - v. Homeowner applicants must agree to affordability period and lien requirements. The affordability period of homes will be based on the amount of assistance provided: a five year affordability period for up to \$10,000 assistance, a 10 year affordability period for \$10,001 to \$80,000 of assistance, and a 20 year affordability period for over \$80,000 of assistance. The lien on the property will be removed upon completion with the terms and conditions of all documents related to the program and completion of the affordability period. Should the homeowner sell or otherwise convey their ownership interest in the property during the affordability period, the remaining prorated amount of assistance will become immediately due and payable.
  - vi. Homeowner applicants must maintain insurance for the assisted property. Hazard, flood (if applicable), and windstorm (if applicable) insurance will be monitored during the length of the affordability period.
  - vii. Where disaster assistance triggers the flood insurance purchase requirement, assisted homeowners will notify any transferee of the requirement to obtain and maintain flood insurance, in writing, and to maintain such written notification in the documents evidencing the transfer of the property, and that the transferring owner may be liable, if he or she fails to do so.
- f. National Objectives: Low- and moderate-income benefit, Urgent need.
- g. Timeframe: The proposed program start date is immediately after HUD's approval of this action plan amendment. The proposed end date is 5 years from the program start date.

## **2. Single Family Development Program**

The devastation to the City of Houston's housing stock resulting from Hurricane Harvey included an unprecedented number of flooded homes. Many of these homes were destroyed or remain uninhabitable. This has forced many residents to relocate either temporarily or permanently. Even before this disaster, many communities had vacant lots in need of infill development. New construction of single family homes will help restore neighborhoods impacted by the storm and improve neighborhoods in need of new, infill development.

The Single Family Development Program will provide new affordable single family homes for low- and moderate-income homebuyers impacted by Hurricane Harvey. HCDD will work with for-profit and non-profit contractors and organizations to implement the program. Properties or lots for new construction will be identified from a variety of sources, including the Houston Land Bank, HCDD's Homeowner Assistance Program, and other organizations that have existing land available.

The affordability period of homes purchased will be a minimum of 20 years. The lien on the property will be removed upon completion with the terms and conditions of all documents related to the program and completion of the affordability period. Should the Homeowner sell or otherwise convey their ownership interest in the property during the affordability period the remaining prorated amount of assistance will become immediately due and payable.

This program will give opportunity to residents to move out of areas that prone to repetitive flooding. It will also give homeowners that need substantial repairs or reconstruction, the immediate opportunity to move to a new home offered for sale through this program. This program will work in conjunction with other recovery programs to provide housing options for those directly and indirectly impacted by Hurricane Harvey.

- a. Allocation Amount: \$200,000,000
- b. Maximum Award: \$200,000 per unit
- c. Eligible Activity: New construction is eligible based on information provided in the Federal Register waiving the requirements of 42 U.S.C.(a) HCDA Section 105 (a)(1), 105(a)(4), 105(a)(7-8), 105(a)(11), 105(a)(14-15)
- d. Ineligible Activity: Properties to be developed cannot be in a floodway or Special Flood Hazard Area
- e. National Objective: Low- and moderate-income benefit.
- f. Selection Criteria: HCDD may consider eligible properties owned by the City of Houston, LARA dba the Houston Land Bank, or other partners for new home construction. Construction will be prioritized to areas that are not at risk of future flooding and that do not pose a current or future environmental hazard. Additional program details including any targeted areas, will be identified in the program guidelines.
- g. Timeframe: The proposed program start date is immediately after HUD's approval of this action plan amendment. The proposed end date is 5 years from the program start date.

### **3. Multifamily Rental Program**

This program will address both direct and indirect impacts of Hurricane Harvey on the Houston's affordable rental housing stock. The shortage of affordable rental housing units available to meet the needs of renters in Houston was exacerbated by Hurricane Harvey. The development of new multifamily rental housing, the acquisition and/or rehabilitation of flood-damaged multifamily rental housing, and strategic land acquisition for multifamily development aims to address this shortage and meet the needs of disaster impacted rental households, including those in public housing. This program will also provide housing designed to meet the needs of special populations.

- a. Allocation Amount: \$314,979,000

- b. Maximum Award: \$40,000,000 per development
- c. Eligible Applicants: Acting individually or as participants in a limited partnership (LP) or limited liability corporation (LLC):
  - i. For-profit developers/ borrowers
  - ii. Public housing authorities
  - iii. Units of local governments
  - iv. Not-for-profit developers/ borrowers
- d. Eligible Activity: Rehabilitation, Reconstruction, New Construction, and Acquisition. HCDA Section 105 (a)(1), 105(a)(3-4), 105(a)(7-8), 105(a)(11), and 105(a)(14-15).
- e. Eligibility Criteria:
  - i. Project must meet CDBG-DR eligibility requirements
  - ii. Development must be located within the city limits of Houston, except in certain cases where the City and County partner on projects that provide housing
  - iii. At a minimum, 51 percent of the units rehabilitated or developed will be reserved for twenty (20) years of an affordability period for low- and moderate-income households earning 80 percent or less of the Area Median Family Income (AMFI) at affordable rents.
  - iv. Affordability periods will be established and affordable rents will comply with High HOME Investment Partnership (HOME) Rents and other existing Land Use Restriction Agreement (LURA) restrictions, as applicable.
  - v. Any substantial rehabilitation, as defined by 24 CFR 5.100, or new construction of a building with more than four rental units will include installation of broadband infrastructure, as required.
  - vi. Property owners receiving disaster assistance that triggers the flood insurance purchase requirement have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance in writing and to maintain such written notification in the documents evidencing the transfer of the property, and the transferring owner may be liable if he or she fails to do so.
  - vii. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) prohibits flood disaster assistance in certain circumstances. In general, it provides that no Federal disaster relief assistance in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for “repair, replacement, or restoration” for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditioned on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property. No disaster assistance may be provided for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement.
- f. National Objective: Low- and moderate-income benefit.

- g. **Property Types:** Multifamily rental housing of eight or more rental units under common ownership.
- h. **Project Selection:** Projects will be selected through an application or request for proposal (RFP) process. The application or RFP will clearly establish the process and acceptance period, threshold criteria (including applicable building codes), selection criteria, and the award process. Selected projects must be completed within 18 months of the effective date of the contract, unless otherwise extended by GLO. Additional project selection criteria and process information will be established in the program guidelines.
- i. **Timeframe:** The proposed program start date is immediately after HUD's approval of this action plan amendment. The proposed end date is 5 years from the program start date.

#### **4. Small Rental Program**

The Small Rental Program aims to rebuild the affordable rental housing stock by rehabilitating small rental properties (1 – 7 units) damaged by Hurricane Harvey and to create new housing stock, through infill development of new small rental properties, to meet the increased demand for this type of rental housing in Houston. This program provides financial assistance, through forgivable loans, to small rental property owners and developers who serve a low- to moderate-income market. This program will assist in expanding the affordable rental housing options, while also stimulating economic growth by assisting landlords and creating jobs in the housing rehabilitation and construction sectors.

Program may include assistance to property owners for:

- 1. Rental income subsidies
- 2. Repair, rehabilitation, or reconstruction of damaged properties
- 3. Reconstruction or conversion of non-disaster damaged property to meet the needs of renters impacted by the affordable rental housing shortage exacerbated by Hurricane Harvey
- 4. New construction of small rental properties
- 5. Housing for special populations
- 6. Resilience measures

Awards for property owners will be based on multiple factors which may include the number of units, size of property, and overall construction need, as well as the benefits received from insurance and other sources. Prioritization criteria may include the prioritization of projects based on length of affordability periods, green building and/or energy star rated units, visitability, ADA/Section 504, mitigation measures, and others. The program guidelines will detail award factors, selection criteria, award calculation/determination methods, construction standards, QA/QC functions, appeals and grievance processes, LMI occupancy requirements, land use restrictions, program compliance, and monitoring, and other program components.

- a. **Allocation Amount:** \$60,005,000
- b. **Maximum Award:** \$3,500,000 per development

- c. Eligible Applicants: Property owners acting individually or as participants in a limited partnership (LP) or limited liability corporation (LLC):
  - i. For-profit developers/ borrowers
  - ii. Public housing authorities
  - iii. Units of local governments
  - iv. Not-for-profit developers/ borrowers
- d. Eligible Activity: Rehabilitation, Reconstruction, New Construction, and Acquisition HCDA Section 105 (a)(1), 105(a)(3-4), 105(a)(7-8), 105(a)(11), and 105(a)(14-15).
- e. Eligibility Criteria:
  - Property owner applicants must
    - i. Provide proof that
      - 1. Property taxes are current,
      - 2. They have an approved payment plan, or
      - 3. There is an approved property tax exemption in place
    - ii. Agree to a limited subrogation of any future awards related to Hurricane Harvey according to duplication of benefits requirements
    - iii. Agree to affordability period and lien requirements

Property must

- i. Not be in a floodway
- ii. Have sustained damage from Hurricane Harvey
- iii. Have an environmental clearance

Development

- i. Must meet CDBG-DR eligibility requirements
- ii. Must be located within the city limits of Houston, except in certain cases where the City and County partner on projects that provide housing
- iii. At a minimum, 51 percent of the units rehabilitated or developed will be reserved for twenty (20) years of an affordability period for low- and moderate-income households earning 80 percent or less of the Area Median Family Income (AMFI) at affordable rents.
- iv. Any substantial rehabilitation, as defined by 24 CFR 5.100, or new construction of a building with more than four rental units will include installation of broadband infrastructure, as required. Developments may include more than one property, such as with a scattered site rental development.
- v. Property owners receiving disaster assistance that triggers the flood insurance purchase requirement have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance in writing and to maintain such written notification in the documents evidencing the transfer of the property, and the transferring owner may be liable if he or she fails to do so.
- vi. Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) prohibits flood disaster assistance in certain circumstances. In general, it provides that no Federal disaster relief assistance made available in a flood disaster

- area may be used to make a payment (including any loan assistance payment) to a person for “repair, replacement, or restoration” for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditioned on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property. No disaster assistance may be provided for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement.
- f. National Objective: Low- and moderate-income benefit.
  - g. Property Types: Small rental properties of one to seven rental units under common ownership.
  - h. Project Selection: Projects will be selected through an application or request for proposal (RFP) process. The application or RFP will clearly establish the process and acceptance period, threshold criteria (including applicable building codes), selection criteria, and the award process. Selected projects must be completed within 18 months of the effective date of the contract, unless otherwise extended by GLO. Project selection criteria and process information will be established in the program guidelines.
  - i. Timeframe: The proposed program start date is immediately after HUD’s approval of this action plan amendment. The proposed end date is 5 years from the program start date.

## **5. Homebuyer Assistance Program**

The Homebuyer Assistance Program will provide funds for downpayment, closing cost, principal buydown, and other direct financial assistance to homebuyers to finance the purchase of a home. This program will help improve homeownership affordability for LMI residents affected by Hurricane Harvey. The Homebuyer Assistance Program will be in tandem with the Homeowner Assistance and Single Family Development Programs, to facilitate the movement of LMI households into new homes after their homes were damaged by Hurricane Harvey. This program will also provide an option for LMI homeowners in floodplains to purchase a home outside the floodplain.

The Homebuyer Assistance Program may provide downpayment and closing cost assistance to eligible LMI households. Direct homeownership assistance under 570.201(n) allows the City to pay up to 100 percent of the downpayment amount required by the lender. The City may also utilize other forms of direct homebuyer assistance such as subsidizing interest rates and mortgage principal amounts, including making grants to reduce the effective interest rate on the amount needed by the LMI household to achieve an affordable mortgage payment level. Primarily, the City will provide direct financial assistance in the form of forgivable loans. The affordability period of homes purchased will be based on the amount of assistance provided: five (5) years for up to \$25,000 of assistance and ten (10) years for \$25,001 to \$50,000 of assistance. The lien on the property will be removed upon completion with the terms and conditions of all documents related to the program and completion of the affordability period. Should the Homeowner sell or

otherwise convey their ownership interest in the property during the affordability period the remaining prorated amount of assistance will become immediately due and payable.

- a. Allocation Amount: \$21,315,000
- b. Maximum Award: \$50,000 per unit
- c. Eligible Activity: This activity is eligible for CDBG-DR funds as listed in 24 CFR 570.201(n) and HCDA section 105(a)(24)
- d. Eligible Applicants: The criteria for establishing eligibility of applicants for assistance through this program are as follows.  
The applicant must:
  - i. Be a homeowner or renter whose home was impacted by Hurricane Harvey
  - ii. Meet income eligibility requirements (up to 120% of AMI)
  - iii. Be a U.S. citizen or permanent resident alien
  - iv. Agree to affordability period and/or lien requirements
- e. National Objective: Low- and moderate-income benefit; Urgent need.
- f. Timeframe: The proposed program start date is immediately after HUD's approval of this action plan amendment. The proposed end date is 5 years from the program start date.

## **6. Buyout Program**

Many homes have flooded repeatedly since 2015, highlighting a need for a more permanent solution for some residents. Through this program, HCDD or a subrecipient will purchase residential structures that have flooded more than once and demolish them to create park amenities, open space, or detention areas. This program is intended to assist residents to move out of areas that have been impacted by multiple disasters or are at high risk of flooding from future disasters. This program is also intended to reduce the impact of future disasters, while encouraging targeted revitalization efforts and the creation of open space.

HCDD may work with subrecipients and other City Departments to implement this program. Buyouts under this program may be part of a larger City or County buyout strategy, in accordance with a long-term plan for the property to become future open space or detention, to avoid removing a viable property from the housing market. It may include the buyout of impacted single and multifamily housing.

- a. Allocation Amount: \$40,000,000 per subrecipient or development
- b. Maximum Assistance: \$40,000,000 per subrecipient

- c. Eligible Activities: This activity is eligible for funds as listed in HCDA section 105(a)(1), 105(a)(7-9) 105(a)(24-25), 5305(a)(8), 24 CFR 570.20(b)(4), and 24 CFR 1003.207(b)(4); 24 CFR 570.201(g) including but are not limited to:
  - i. Buyouts
  - ii. Demolition
  - iii. Relocation Assistance
  - iv. Payment of Non-Federal Share
  - v. Housing incentives
- d. Ineligible Activities:
  - i. Forced mortgage payoff;
  - ii. Incentive payments to households that move to disaster-impacted floodplains;
  - iii. Properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for rehabilitation assistance or housing incentives;
  - iv. Assistance for the repair, replacement, or restoration of a property to a person who has failed to meet Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a), which states that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for “repair, replacement, or restoration” for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditional on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required. under applicable Federal law on such property.
- e. Eligibility Criteria for Assistance:
  - Residential Structures
    - Property
      - i. Owner-occupied at the time of the storm
      - ii. Served as homeowner’s primary residence
      - iii. Sustained damage from Hurricane Harvey
      - iv. Environmentally cleared
    - Homeowner
      - i. All homeowner applicants and co-applicants must be current on payments for child support.
      - ii. Homeowner applicants must furnish evidence that property taxes are current, under an approved payment plan, or that they have an exemption under current laws.
      - iii. Homeowner applicants must agree to a limited subrogation of any future awards related to Hurricane Harvey, to ensure duplication of benefits compliance.
- f. Program guidelines will detail applicant or project eligibility requirements, application process, compliance with Uniform Relocation Act regulations, and other information.
- g. National Objective: Low- and moderate-income benefit; Urgent need.



- h. Timeframe: The proposed program start date is immediately after HUD's approval of this action plan amendment. The proposed end date is 5 years from the program start date.

## 7. Public Services

Houstonians were impacted by Hurricane Harvey in many ways. Physical property was damaged, homes were flooded, and personal possessions were lost. The lingering effects of this damage has impacted resident's physical and mental health. In addition, vulnerable populations are often less able to recover from disaster impacts, which could directly affect their job prospects and housing options.

Public services offered will complement housing programs to provide a comprehensive approach to recovery for Houstonians. These services will support residents to find housing, remedy housing issues, or to become more resilient in future disasters, whether they be natural, economic, or personal, creating a stronger more prepared community.

Services may include housing counseling, legal assistance, transportation services, fair housing services, health/mental health services, employment training, workforce development, and other services to address the needs of those impacted by Hurricane Harvey. Housing counseling and legal assistance services will assist in furthering fair housing by addressing housing barriers and allowing residents greater choice to move to neighborhoods with higher opportunity. Employment training and workforce development programs, including those that support housing recovery and housing construction, will address the need for job skills to support Houston's recovery. In addition, workforce development will help boost long-term recovery by supplying residents of impacted communities with the necessary skills and opportunities to increase household income. To address the needs of those impacted who have become homeless or are at risk of becoming homeless, services may include subsistence payments, rental housing subsidies, security deposits, and other services to assist in housing and/or rehousing this population.

The provision of public services is also intended to assist residents in preparing and qualifying for HCDD's housing programs. Remedying title or tax issues through legal services and providing housing counseling for low- and moderate-income communities, may prepare more residents to become eligible for HCDD's Homeowner Assistance and Homebuyer Assistance Programs.

- a. Allocation Amount: \$60,000,000
- b. Maximum Award: \$5,000,000 per subrecipient
- c. National Objective: Low- and moderate-income benefit.
- d. Eligible Activity: Eligible activities include the provision of public services as listed in HCDA Sec. 105(a)(8)

- e. **Eligible Applicants:** Subrecipients will be determined through an application or RFP process and will include non-profit and for-profit agencies and City Departments. Houstonians will receive assistance directly through the selected subrecipients. These subrecipients will ensure services are open to all residents, including those with limited English proficiency or other special needs populations.
- f. **Selection Criteria:** Projects and subrecipients will be selected through an application or request for proposal (RFP) process. The application or RFP will clearly establish the process and acceptance period, threshold criteria, selection criteria, and the award process. Selection criteria and any prioritization of impacted households will be established in the Public Services guidelines, RFP, or application.

Through the selected subrecipients, public services will be provided to primarily low- and moderate-income persons or persons in low- and moderate-income areas. This may include those that need public services to assist them in accessing housing programs or becoming eligible for housing programs. Receiving public services offered is not contingent upon also receiving services through the housing programs offered.

- g. **Timeframe:** The proposed start date of public services is immediately after HUD's approval of this action plan amendment. The proposed end date is 5 years from the public services start date.

## **8. Economic Revitalization Program**

This Economic Revitalization Program will help create jobs that will improve the economic viability of areas impacted by Hurricane Harvey. Many small businesses were impacted, resulting in lost earnings. This has direct implication for a household's ability to pay for housing, especially for the 0-30% AMI households, that may become homeless when a household member loses employment.

This program will assist in creating and retaining jobs in the community by providing credit and technical assistance to businesses, including microenterprises. It is intended that this program will support small businesses that include, but is not limited to those providing housing construction services, to work with and complement the housing programs funded with CDBG-DR funds. Economic revitalization activities must contribute to the long-term recovery and restoration of housing.

- a. **Allocation Amount:** \$30,264,834
- b. **Maximum Award:** \$10,000,000 per subrecipient
- c. **National Objective:** Low- and moderate-income benefit.
- d. **Eligible Activity:** This activity is eligible for funds as listed in HCDA section 105(a)(17), 105(a)(19), 105(a)(22).

- e. Eligible Applicants: Eligibility criteria will be included in the program guidelines.
- f. Timeframe: The proposed program start date is immediately after HUD's approval of this Action Plan. The proposed end date is 5 years from the program start date.

## **9. Planning**

Funding will be used for planning activities that will benefit the most impacted and distressed areas. Vulnerable populations or neighborhoods often struggle to bounce back from disasters. Planning activities will be focused on various mitigation and resiliency efforts to protect Houstonians and help them recover from disasters.

Planning activities will include community engagement to inform the City's recovery plan development and to support various city-wide housing activities. The City may also use these funds to study specific topics related to mitigation or resilience or plan for specific projects that could address impacts of Hurricane Harvey or the recurring nature of disasters in Houston. The types of studies or plans could include flood control, drainage improvement, resilient housing solutions, fair housing, homelessness, surge protection, economic development, infrastructure improvements, or other efforts to further recovery from Hurricane Harvey, mitigate future damages, and establish plans for comprehensive recovery efforts.

The GLO has limited Houston's planning costs to 5% of its allocation. The City of Houston will administer these funds as a subrecipient of the GLO. Further amendments may convert a portion of these planning funds to other eligible expenses to execute specific projects, which may have been studied or developed through the planning process.

- a. Allocation Amount: \$23,100,000
- b. Eligible Activities: The eligible activity is planning, urban environmental design, and policy-planning-management-capacity building activities as listed in 24 CFR 570.205.
- c. Timeframe: The proposed program start date is immediately after HUD's approval of this action plan amendment. The proposed end date is 5 years from the program start date.

## **10. Housing Administration**

The GLO will retain the full 5% allocated for administrative costs associated with CDBG-DR17 for purposes of oversight, management, and reporting. The only exception is for an allowance for up to 2% of program amounts for costs associated with housing activities that will require administrative type activities. Houston plans to budget the full 2% for administrative costs allowed by the GLO for program administrative costs related to housing activities as listed in 24 CFR 570.206.

- a. Allocation Amount: \$20,426,557

- b. Caps: The GLO will allow the City to spend up to 10% of program amounts for costs directly related to implementation of housing activities and 6% for non-housing and infrastructure activities. The GLO has capped engineering and design activities at 15% of the total project award, unless special services are necessary, subject to GLO approval. These activity delivery costs will be defined in the City's applications to the GLO for individual programs and projects, as needed.
- c. Timeframe: The proposed program start date is immediately after HUD's approval of this action plan amendment. The proposed end date is 5 years from the program start date.

## IV. Citizen Participation

### A. Community Consultation

Beginning in April 2018, the City's Housing and Community Development Department (HCDD) convened a small working group of community stakeholders and organizations to discuss best practices and a path forward for community engagement to ensure that Houstonians have significant input in how the City utilizes Hurricane Harvey CDBG-DR funding. HCDD's approach throughout its engagement process is two-fold - informing the community about the fundamentals of CDBG-DR funding and gathering input at the neighborhood level to better understand unmet disaster-related needs. In consultation with community stakeholders, HCDD has adopted the following principles in reaching out to disaster-affected communities:

- Be transparent with the community about data and programs to address outstanding disaster related issues
- Inform residents about the CDBG-DR funding process including the Action Plan process, regulation requirements, eligible and ineligible activities, and interim resources available
- Seek representative input from different areas in the city
- Provide multiple avenues for residents to give feedback
- Link community input to decisions about disaster recovery funding
- Leverage meetings already scheduled with external partners, in addition to scheduling City-hosted meetings

Throughout May and June 2018, HCDD worked with community groups, groups representing protected classes, Super Neighborhood Councils, civic groups, and City Council Members to host public meetings around the city to inform the City's Action Plan. Additionally, HCDD engaged community partners, such as [bc] Workshop, University of Houston - College of Architecture Community Design Resource Center, and University of Texas School of Health, to provide meeting facilitation and record-keeping assistance. The format of these meetings includes a presentation on CDBG-DR funding followed by facilitated table discussions on key disaster recovery challenges and priorities. Table discussions have focused on neighborhoods, with residents discussing their post-disaster concerns around neighborhood-specific topics. Considering the targeted audience, meetings have been conducted in English and Spanish, with interpretation services available, as needed.

In addition, HCDD convened and participated in several disaster recovery community engagement events with expert groups of developers and housing advocates. To elicit feedback on disaster recovery needs on a city-wide scale, HCDD launched a Hurricane Harvey public survey in English and in Spanish on May 14, 2018. As of June 24, 2018, HCDD received 746 responses.

## V. Appendix A: Projected Expenditures and Outcomes

### Expenditure Summary

Activity	Budget	2018		2019		2020		2021		2022		2023		Total
Homeowner Assistance Program	\$385,028,859	\$770,058	0.2%	\$96,257,215	25%	\$96,257,215	25.0%	\$96,257,215	25.0%	\$57,754,329	15.0%	\$37,732,828	9.8%	100.0%
Single Family Development Program	\$200,000,000	\$400,000	0.2%	\$40,000,000	20%	\$40,000,000	20.0%	\$40,000,000	20.0%	\$40,000,000	20.0%	\$39,600,000	19.8%	100.0%
Multifamily Rental Program	\$314,979,000	\$629,958	0.2%	\$6,299,580	2%	\$40,947,270	13.0%	\$78,744,750	25.0%	\$94,493,700	30.0%	\$93,863,742	29.8%	100.0%
Small Rental Program	\$60,005,000	\$120,010	0.2%	\$1,200,100	2%	\$12,001,000	20.0%	\$18,001,500	30.0%	\$18,001,500	30.0%	\$10,680,890	17.8%	100.0%
Homebuyer Assistance Program	\$21,315,000	\$42,630	0.2%	\$1,065,750	5%	\$2,131,500	10.0%	\$6,394,500	30.0%	\$6,394,500	30.0%	\$5,286,120	24.8%	100.0%
Buyout Program	\$40,000,000	\$80,000	0.2%	\$1,200,000	3%	\$12,000,000	30.0%	\$12,000,000	30.0%	\$14,720,000	36.8%	\$0	0.0%	100.0%
Housing Administration	\$20,426,557	\$2,042,656	10.0%	\$4,085,311	20%	\$3,676,780	18.0%	\$3,676,780	18.0%	\$3,676,780	18.0%	\$3,268,249	16.0%	100.0%
Public Services	\$60,000,000	\$120,000	0.2%	\$3,000,000	5%	\$18,000,000	30.0%	\$18,000,000	30.0%	\$15,000,000	25.0%	\$5,880,000	9.8%	100.0%
Economic Revitalization Program	\$30,264,834	\$60,530	0.2%	\$605,297	2%	\$9,079,450	30.0%	\$9,079,450	30.0%	\$7,566,209	25.0%	\$3,873,899	12.8%	100.0%
Planning	\$23,100,000	\$2,310,000	10.0%	\$4,620,000	20%	\$6,930,000	30.0%	\$5,775,000	25.0%	\$2,310,000	10.0%	\$1,155,000	5.0%	100.0%
<b>TOTAL</b>	<b>\$1,155,119,250</b>	<b>\$6,575,841</b>	<b>0.6%</b>	<b>\$158,333,253</b>	<b>14%</b>	<b>\$241,023,215</b>	<b>21%</b>	<b>\$287,929,195</b>	<b>25%</b>	<b>\$259,917,018</b>	<b>23%</b>	<b>\$201,340,728</b>	<b>17%</b>	<b>100.0%</b>

## Quarterly Expenditures by Year

Program/Activity	Program Allocation	2018			
		Q1	Q2	Q3	Q4
Homeowner Assistance Program	\$385,028,859	\$0	\$0	\$385,029	\$385,029
Single Family Development Program	\$200,000,000	\$0	\$0	\$200,000	\$200,000
Multifamily Rental Program	\$314,979,000	\$0	\$0	\$314,979	\$314,979
Small Rental Program	\$60,005,000	\$0	\$0	\$60,005	\$60,005
Homebuyer Assistance Program	\$21,315,000	\$0	\$0	\$21,315	\$21,315
Buyout Program	\$40,000,000	\$0	\$0	\$40,000	\$40,000
Housing Administration	\$20,426,557	\$0	\$0	\$1,021,328	\$1,021,328
Public Services	\$60,000,000	\$0	\$0	\$60,000	\$60,000
Economic Revitalization Program	\$30,264,834	\$0	\$0	\$30,265	\$30,265
Planning	\$23,100,000	\$331,000	\$331,000	\$824,000	\$824,000
Grand Total	\$1,155,119,250	\$331,000	\$331,000	\$2,956,921	\$2,956,921
Funds Remaining		\$1,154,788,250	\$1,154,457,250	\$1,151,500,330	\$1,148,543,409

Program/Activity	Program Allocation	2019			
		Q1	Q2	Q3	Q4
Homeowner Assistance Program	\$385,028,859	\$9,625,721	\$28,877,164	\$28,877,164	\$28,877,164
Single Family Development Program	\$200,000,000	\$4,000,000	\$12,000,000	\$12,000,000	\$12,000,000
Multifamily Rental Program	\$314,979,000	\$629,958	\$1,889,874	\$1,889,874	\$1,889,874
Small Rental Program	\$60,005,000	\$120,010	\$360,030	\$360,030	\$360,030
Homebuyer Assistance Program	\$21,315,000	\$106,575	\$319,725	\$319,725	\$319,725
Buyout Program	\$40,000,000	\$120,000	\$360,000	\$360,000	\$360,000
Housing Administration	\$20,426,557	\$408,531	\$1,225,593	\$1,225,593	\$1,225,593
Public Services	\$60,000,000	\$300,000	\$900,000	\$900,000	\$900,000
Economic Revitalization Program	\$30,264,834	\$60,530	\$181,589	\$181,589	\$181,589
Planning	\$23,100,000	\$462,000	\$1,386,000	\$1,386,000	\$1,386,000
Grand Total	\$1,155,119,250	\$15,833,325	\$47,499,976	\$47,499,976	\$47,499,976
Funds Remaining		\$1,132,710,084	\$1,085,210,108	\$1,037,710,132	\$990,210,156

Program/Activity	Program Allocation	2020			
		Q1	Q2	Q3	Q4
Homeowner Assistance Program	\$385,028,859	\$24,064,304	\$24,064,304	\$24,064,304	\$24,064,304
Single Family Development Program	\$200,000,000	\$10,000,000	\$10,000,000	\$10,000,000	\$10,000,000
Multifamily Rental Program	\$314,979,000	\$10,236,818	\$10,236,818	\$10,236,818	\$10,236,818
Small Rental Program	\$60,005,000	\$3,000,250	\$3,000,250	\$3,000,250	\$3,000,250
Homebuyer Assistance Program	\$21,315,000	\$532,875	\$532,875	\$532,875	\$532,875
Buyout Program	\$40,000,000	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000
Housing Administration	\$20,426,557	\$919,195	\$919,195	\$919,195	\$919,195
Public Services	\$60,000,000	\$4,500,000	\$4,500,000	\$4,500,000	\$4,500,000
Economic Revitalization Program	\$30,264,834	\$2,269,863	\$2,269,863	\$2,269,863	\$2,269,863
Planning	\$23,100,000	\$1,732,500	\$1,732,500	\$1,732,500	\$1,732,500
Grand Total	\$1,155,119,250	\$60,255,804	\$60,255,804	\$60,255,804	\$60,255,804
Funds Remaining		\$929,954,352	\$869,698,549	\$809,442,745	\$749,186,941



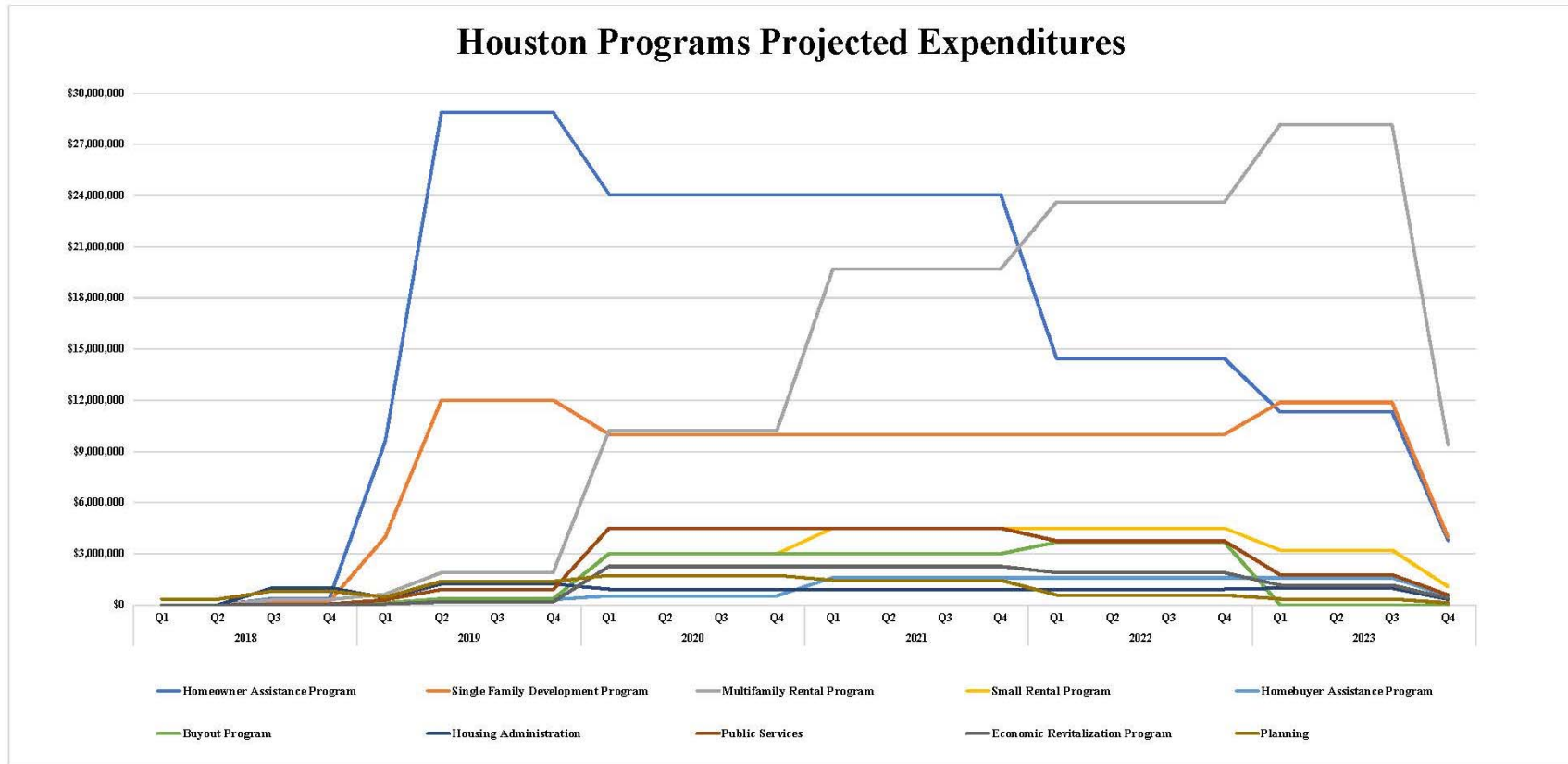
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Program/Activity	Program Allocation	2021			
		Q1	Q2	Q3	Q4
Homeowner Assistance Program	\$385,028,859	\$24,064,304	\$24,064,304	\$24,064,304	\$24,064,304
Single Family Development Program	\$200,000,000	\$10,000,000	\$10,000,000	\$10,000,000	\$10,000,000
Multifamily Rental Program	\$314,979,000	\$19,686,188	\$19,686,188	\$19,686,188	\$19,686,188
Small Rental Program	\$60,005,000	\$4,500,375	\$4,500,375	\$4,500,375	\$4,500,375
Homebuyer Assistance Program	\$21,315,000	\$1,598,625	\$1,598,625	\$1,598,625	\$1,598,625
Buyout Program	\$40,000,000	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000
Housing Administration	\$20,426,557	\$919,195	\$919,195	\$919,195	\$919,195
Public Services	\$60,000,000	\$4,500,000	\$4,500,000	\$4,500,000	\$4,500,000
Economic Revitalization Program	\$30,264,834	\$2,269,863	\$2,269,863	\$2,269,863	\$2,269,863
Planning	\$23,100,000	\$1,443,750	\$1,443,750	\$1,443,750	\$1,443,750
Grand Total	\$1,155,119,250	\$71,982,299	\$71,982,299	\$71,982,299	\$71,982,299
Funds Remaining		\$677,204,642	\$605,222,343	\$533,240,045	\$461,257,746

Program/Activity	Program Allocation	2022			
		Q1	Q2	Q3	Q4
Homeowner Assistance Program	\$385,028,859	\$14,438,582	\$14,438,582	\$14,438,582	\$14,438,582
Single Family Development Program	\$200,000,000	\$10,000,000	\$10,000,000	\$10,000,000	\$10,000,000
Multifamily Rental Program	\$314,979,000	\$23,623,425	\$23,623,425	\$23,623,425	\$23,623,425
Small Rental Program	\$60,005,000	\$4,500,375	\$4,500,375	\$4,500,375	\$4,500,375
Homebuyer Assistance Program	\$21,315,000	\$1,598,625	\$1,598,625	\$1,598,625	\$1,598,625
Buyout Program	\$40,000,000	\$3,680,000	\$3,680,000	\$3,680,000	\$3,680,000
Housing Administration	\$20,426,557	\$919,195	\$919,195	\$919,195	\$919,195
Public Services	\$60,000,000	\$3,750,000	\$3,750,000	\$3,750,000	\$3,750,000
Economic Revitalization Program	\$30,264,834	\$1,891,552	\$1,891,552	\$1,891,552	\$1,891,552
Planning	\$23,100,000	\$577,500	\$577,500	\$577,500	\$577,500
Grand Total	\$1,155,119,250	\$64,979,254	\$64,979,254	\$64,979,254	\$64,979,254
Funds Remaining		\$396,278,491	\$331,299,237	\$266,319,982	\$201,340,728

Program/Activity	Program Allocation	2023			
		Q1	Q2	Q3	Q4
Homeowner Assistance Program	\$385,028,859	\$11,319,848	\$11,319,848	\$11,319,848	\$3,773,283
Single Family Development Program	\$200,000,000	\$11,880,000	\$11,880,000	\$11,880,000	\$3,960,000
Multifamily Rental Program	\$314,979,000	\$28,159,123	\$28,159,123	\$28,159,123	\$9,386,374
Small Rental Program	\$60,005,000	\$3,204,267	\$3,204,267	\$3,204,267	\$1,068,089
Homebuyer Assistance Program	\$21,315,000	\$1,585,836	\$1,585,836	\$1,585,836	\$528,612
Buyout Program	\$40,000,000	\$0	\$0	\$0	\$0
Housing Administration	\$20,426,557	\$980,475	\$980,475	\$980,475	\$326,825
Public Services	\$60,000,000	\$1,764,000	\$1,764,000	\$1,764,000	\$588,000
Economic Revitalization Program	\$30,264,834	\$1,162,170	\$1,162,170	\$1,162,170	\$387,390
Planning	\$23,100,000	\$346,500	\$346,500	\$346,500	\$115,500
Grand Total	\$1,155,119,250	\$60,402,218	\$60,402,218	\$60,402,218	\$20,134,073
Funds Remaining		\$140,938,510	\$80,536,291	\$20,134,073	\$0





## VI. Appendix B: Public Comment

The City of Houston published its draft local action plan on Thursday, June 7, 2018 and accepted public comments through Sunday, June 24, 2018. The City published a press release, social media posts, and a public notice in the *Houston Chronicle* and several other community newspapers announcing the availability of the plan online at HCDD's website and in hard copy at the Houston Public Library and at HCDD's office. The following is a list of those that submitted public comment

Name		Individual, County, City or Organization
Last	First	
Boston-Perez	Laura	Texas Organizing Project
Brents	Tom	Garden Villas Community Association
Burroughs	Roberta	
De Hoyos	Janie	Individual
De Leon	Gina	Harvey Partners Network
Egge	Rosalinda	Individual
Fisher	Bill	Sonoma Housing Advisors
Gage	Brian	Houston Housing Authority
Henneberger	John	Texas Housers (Texas Low Income Housing Information Service)
		Houston Housing Collaborative
Hunter	Veralisa	Individual
J	Rick	Individual
Jackmon	Amira	Individual
Khalil	Hany	Texas Gulf Coast Area Labor Federation, AFL-CIO
Lawler	Mary	Avenue
Legette	Sasha	Houston Organizing Movement for Equity (HOME)
Miles	Borris	State Senator
Murphy	Jim	State Representatives District 133
Sequra	Maribel	Individual
Shields	Vincent	Individual
Smith	Mark	Individual
Vruqqink	Matthew	Ojala Holding, LLC
Timm	Amanda	LISC Houston
Thibaudeau	Eva	Coalition for the Homeless
Zini	Christina	Individual
		The Metropolitan Organization (TMO)

The following is a summary of the comments received as well as the response.

**Comment Received:** While the Homebuyer Assistance Program benefits families, policies should ensure that the benefit goes to families and not to subsidize any inflated interest rates allowing lenders to recapture funds intended to go to build the family's financial stability.

**Staff Response:** Your comments will be considered as program guidelines are developed for the Homebuyer Assistance Program.

**Comment Received:** The City should incorporate the following into the local action plan: 1) Texas Houser's Hurricane Survivor Recovery, Rights Principles and Initiatives, 2) an updated methodology to determine unmet needs, 3) reallocate funds from the local infrastructure program and Economic Revitalization Program. 4) clear rental affordability requirements for each income category that are based on the income group's proportional shares of households with unmet needs, 5) adoption of an outreach plan prior to program implementation, 6) funding for housing assistance activities to remedy title and property tax issues, 7) the Homeowner Opportunity Program, 8) provision of payment for buyout activities above current fair market value and use incentive payments, 9) more information about elevation costs and priorities, 10) review and update resiliency multiplier, 11) incorporation of data to analyze protected classes, 12) additions about fair housing, 13) targets for assistance to low- and moderate-income households for the Buyout Program, 14) prioritization of flood control in low- and moderate-income neighborhoods, 15) target rental housing for income categories based on unmet need to serve extremely low-income renters and prioritize developments in high opportunity areas, 16) add information about the City's public website to ensure transparency.

**Staff Response:** HCDD followed the methodology provided by the GLO for the unmet needs assessment including the resiliency multiplier in the local action plan and is in the process of analyzing additional data for the in-depth needs assessment. The in-depth needs assessment will supplement information provided in the local action plan and include data about protected classes, as feasible. This information will be used in the program design. Priorities for affordability will be included in program guidelines, and your prioritization for extremely low-income and very low-income rental will be considered in guideline development. Information about the Hurricane Ike Homeowner Opportunity program and buyout payment specifications will also be considered in program development. As program guidelines are developed, an outreach plan will be developed to ensure programs are made available to all eligible applicants. There is no current funding allocated to a local infrastructure program and infrastructure projects are not prioritized in the local action plan. The Economic Revitalization Program will help to provide jobs and support small businesses to complement the housing programs. Funding has been allocated to public service activities, which may include housing services to assist remediating property title and tax issues. HCDD will continue to build upon and expand its community engagement efforts in the long-term disaster recovery process, which will include transparency and accountability to gain public trust. HCDD's website, along with other communication mediums, will be utilized to inform the public about program guidelines, program requirements, application processes, and other information, as appropriate.

**Comment Received:** Continue the City's robust public engagement efforts that have already begun. Incorporate a comprehensive approach to revitalization of affected neighborhoods, including updating and strengthening neighborhood preservation and neighborhood protection policies. Economic revitalization efforts should also include deferred payment loans to small businesses affected by Harvey and job training for youth. Barriers to affordable homeownership and renting safe housing should be addressed through best practices.

**Staff Response:** The City will continue to partner with community organizations and neighborhood groups to build on community engagement efforts already underway. As program guidelines are developed, the City will focus on ways in which CDBG-DR investment can influence neighborhood revitalization and strengthen neighborhood preservation. The City will consider recommendations made about the Economic Revitalization Program as the program is designed and intends to undertake a holistic approach to recovery that leverages public service activities, such as job training and preparation for homeownership, to help remove barriers to safe housing and expand homeownership options.

**Comment Received:** Can the City analyze additional data to get a better picture of need and accurately depict unmet need? Clarification is needed regarding the reimbursement program about timing, environmental clearance, and the award calculation method.

**Staff Response:** The City is in the process of developing an in-depth needs assessment to supplement data provided in the local action plan. This assessment will include additional data to better define and expand upon the characteristics of unmet need in Houston. The reimbursement option of the Homeowner Assistance Program will include homeowners that have completed partial or full repairs on their homes before applying to the program. The repairs must comply with program specific environmental review requirements. The maximum award amounts for reimbursement are set by the Homeowner Assistance Program, unless otherwise specified in the program guidelines.

**Comment Received:** A local organization providing financial, strategic and technical assistance to build inclusive communities made the following recommendations: 1) continue robust outreach and community engagement efforts, 2) include development of nonprofit capacity in all recovery programs, 3) commit to full transparency and accountability, 4) publish results from community engagement, 5) align goals with other affordable housing and community development initiatives already underway in the city, 6) integrate resiliency planning and design in the action plan and recovery programs, 7) leverage all resources to holistically revitalize affected neighborhoods, 8) clarify Section 3 and MBE/WBE participation, 9) connect job training and workforce development to CDBG-DR funded construction investments.

**Staff Response:** HCDD will strive to build upon and expand its community engagement efforts in the long-term disaster recovery process, which will include transparency and accountability to gain public trust. HCDD will make a summary of community engagement from May and June 2018 available online. HCDD partners with and depends on nonprofit partners to help achieve its goals and will work to assist with providing opportunities for capacity building. As program guidelines are developed, efforts will be made to align programs to other housing and community development initiatives, as appropriate, to create a holistic neighborhood revitalization approach

to CDBG-DR investments and to integrate resiliency design and construction best practices. As guidelines for the Economic Development Program are developed and Requests for Proposals are issued, effort will be made to clarify Section 3 and MBE/WBE requirements. In this program, HCDD will also strive to link workforce development and job training programs with the construction and rehabilitation programs, as appropriate.

**Comment Received:** A collective of people and organizations working to promote affordable housing made the following recommendations: 1) continue robust outreach and community engagement efforts, 2) include development of nonprofit capacity in all recovery programs, 3) commit to full transparency and accountability, and 4) align goals with other initiatives already underway,

**Staff Response:** HCDD will continue to build upon and expand its community engagement efforts in the long-term disaster recovery process and will include transparency and accountability in its community outreach to gain public trust. As program guidelines are developed, efforts will be made to align programs to other housing and community development initiatives already underway in the city, as appropriate. HCDD depends on nonprofit partners to help achieve its goals and will work to assist with providing opportunities for their capacity building.

**Comment Received:** The commenter made the following recommendations 1) use an equity-based approach to recovery efforts to ensure low-income families qualify for mitigation and buyout programs, 2) ensure quality disaster case management for individualized recovery, 3) commit to transparency and accountability in the recovery process, and 4) improve data and technology to inform solutions.

**Staff Response:** HCDD will prioritize low- and moderate-income families and ensure outreach to and funding for families in all low-income categories. HCDD agrees that case management is a component to help individuals with personalized assistance and is in the selection process to hire a case management firm to supplement HCDD's current staff. HCDD is also building upon and expanding its community engagement efforts in the long-term disaster recovery process, which will include transparency and accountability to gain public trust. HCDD will strive to use the best available data for program design and may consider investing in data systems and technology solutions to create efficiencies in the recovery process.

**Comment Received:** A coalition of organizations supporting equity recommended to: 1) prioritize low- and moderate-income families, 2) allocate funds proportionally by household income in LMI categories, 3) create family-sustaining jobs, 4) ensure public service programs match needs, 5) extend rental affordability, 5) make buyouts fair for families, 6) prioritize intentional and ongoing community engagement, 7) Ensure recovery system is navigable, 8) promote environmentally-friendly standards, 9) ensure proper oversight and quality control of construction, 10) offset the burden of insurance, and 11) minimize source of income discrimination.

**Staff Response:** HCDD will prioritize low- and moderate-income families and ensure outreach to and funding for families in all low-income categories. HCDD looks forward to partnering with other agencies to provide sustainable jobs and workforce development programs for low-income persons. HCDD will continue to build upon existing relationships to expand community

engagement through the process of developing guidelines and program implementation. As the guidelines for housing programs are developed, staff will consider these program specific recommendations.

**Comment Received:** A group of community development practitioners and groups engaging in disaster recovery recommended to: 1) continue expanding outreach and community engagement efforts, 2) align action plan goals with other initiatives underway, 3) use an equity-based approach to recovery efforts to ensure low-income families qualify for programs, 4) utilize quality case managements, and 5) commit to transparency and accountability in the recovery process.

**Staff Response:** HCDD staff will continue to build upon and expand its community engagement efforts in the long-term disaster recovery process, which will include transparency and accountability to gain public trust. As program guidelines are developed, efforts will be made to align programs to other housing and community development initiatives, as appropriate, and to provide safe housing for homeowners to prevent future flooding. HCDD agrees that case management is a component to help individuals with personalized assistance and is currently in the selection process to hire a case management firm to supplement current staff.

**Comment Received:** I need assistance repairing my home.

**Staff Response:** Please contact HCDD staff representing the Home Repair Program. You may call 832.394.6200, send an email to [homerepair@houstontx.gov](mailto:homerepair@houstontx.gov), or learn more information about the programs online at [http://www.houstontx.gov/housing/home\\_repair\\_programs.html](http://www.houstontx.gov/housing/home_repair_programs.html).

**Comment Received:** Why is the City not addressing infrastructure issues with FEMA payout? What community input is needed and when? Is the repair and replace program being developed? Does Texas Organizing Project have a contract with the City of Houston?

**Staff Response:** The City has applied for FEMA Public Assistance (PA) funding for repairs needed to various City owned infrastructure and will apply for additional FEMA PA as applications are developed. HUD is expected to announce additional CDBG-DR in Fall 2018 to address infrastructure and mitigation needs. Additional community input about CDBG-DR funds that address housing needs will be solicited in July through September 2018 as program guidelines are developed. The Homeowner Assistance Program, as summarized in the local action plan, has repair and reconstruction components that will be available to single family homeowners. The City does not have a contract with the Texas Organizing Project regarding this local action plan.

**Comment Received:** The City should utilize the affordable housing plan that was developed by Midtown Redevelopment Authority and the Center for Civic and Public Policy Improvement that would assist the City to quickly spend the disaster recovery funding on shovel ready projects.

**Staff Response:** HCDD looks forward to working with the Midtown Redevelopment Authority to implement affordable housing strategies.

**Comment Received:** The commenter made recommendations to strategically advance equity when utilizing disaster recovery funds in Houston. General recommendations include to: 1) build

intentional and ongoing community involvement into the local action plan, 2) prioritize low-income families, 3) use FEMA and other data to assess need, 4) utilize sound methodology to determine loss and unmet needs, 5) include impacted undocumented Houston families, 6) ensure accessibility to city programs, and 7) invest in future-looking planning and community response. Recommendations about housing programs included: 1) calculate buyout assistance based on comparable relocation costs, 2) provide other forms of assistance to homeowners based on need, 3) make single family homes and multifamily units greener and affordable, and 4) improve infrastructure to protect neighborhoods in harm's way. Recommendations about job creation include: 1) create a Disaster Recovery Workforce Development Program, 2) create Community Workforce Hiring Program, 3) develop Disaster Recovery Contractor Policy, and 4) increase theft of service enforcement. Finally, environmental justice recommendations were made to ensure resiliency and minimize health consequences.

**Staff Response:** HCDD will continue to build on relationships with community organizations to expand the community engagement supporting the long-term disaster recovery process. Programs will follow regulations and guidelines provided by HUD and the GLO and will prioritize assistance for low- and moderate-income persons. HCDD is working to utilize various data sources and create new datasets to assess need, determine unmet need, and guide programs. The program specific recommendations about the residential buyout assistance calculation, affordability targets for rental housing, assistance to homeowners, the Homeowner Opportunity Program, building green housing, mitigating infrastructure to protect residents from future flooding, creating a workforce development and hiring program, and ensuring environmental justice will be considered as HCDD develops recovery program guidelines in the next few months.

**Comment Received:** The City should recognize the needs of and provide grants to residents who received Substantial Damage letters and must now rebuild their home at a higher elevation, as mandated by City code.

**Staff Response:** HCDD will consider your priority recommendation when developing the guidelines for the Homeowner Assistance Program.

**Comment Received:** Will there be a cap on the maximum award for the Multifamily Rental Program. Is there a target allocation between acquisition, rehab, and new construction? Is there a funding cap? Is there an affordability term and is the loan forgivable? Is it 18 months to complete project and is that reasonable period of time for completion?

**Staff Response:** As stated in the local action plan, the Multifamily Rental Program has a maximum award amount of \$40,000,000 per development with a minimum affordability period of 20 years. The effective date of the contract is the date the agreement with the borrower is executed and closed. This is often followed by a 30-day mobilization period until work begins on the project. Currently under development, the program guidelines will contain specific information regarding any additional funding caps, targeted amounts for acquisition, rehabilitation, and new construction, and other priorities.

**Comment Received:** There is a need for neighborhood preservation and protecting communities, such as those in the Third and Fourth Ward, against gentrification and blight. Funds should be used

for non-traditionally designed homes that allow the community to remain interconnected and help preserve neighborhood character.

**Staff Response:** In the recovery process, HCDD will strive to provide affordable housing that best fits the community's need without displacement. HCDD is interested in working with local organizations and developers to provide various affordable housing options. HCDD will offer a Small Rental Program to rehabilitate and develop rental housing between 1 and 7 units. In addition, HCDD continues to promote the creation of a community land trust to ensure long-term affordability of housing in Houston.

**Comment Received:** To prevent and end homelessness, use disaster recovery funds for: 1) supportive services paired with rental subsidies, 2) rental subsidies for short- and long-term assistance, 3) acquisition of multifamily unit acquisition to dedicate for persons experiencing homelessness, 4) acquisition of small properties to accommodate homeless persons in need of additional mental health and health assistance, and 5) rehabilitating existing apartments for use by persons exiting homelessness.

**Staff Response:** With disaster recovery funding, HCDD intends to fund public service activities that stabilize persons and families at risk of homelessness and prepare them for permanent housing solutions. These activities may include, but are not limited to, homeless prevention services, housing counseling, legal counseling, job training, and mental and general health services. More targeted services, such as subsistence payments, rental housing subsidies, security deposits and other services that assist in the housing and/or rehousing of the homeless or those at risk of becoming homeless may also be undertaken. The Multifamily Rental Program and Small Rental Program will help assist families impacted by Harvey, including those exiting homelessness, to access safe, affordable rental housing. HCDD will consider your input regarding dedicated multifamily units as permanent housing options for the homeless and creating accommodations for persons with substance abuse disorders as the guidelines for the housing programs are developed in the next few months.

**Comment Received:** The Homeowner Assistance Program should include set-aside funds for those that receive and accept the substantial damage letters from the City of Houston. Housing assistance should be provided to non-LMI homeowners. Non-housing programs should have limited funding.

**Staff Response:** HCDD will consider your priority recommendation for homeowners who receive substantial damage letters when developing the guidelines for the Homeowner Assistance Program. HCDD continues to analyze data and will develop an in-depth needs assessment, which will help HCDD target programs. The City plans to utilize this CDBG-DR round of funding only for housing and housing related activities.

**Comment Received:** The \$40 million maximum award amount per development for the Multifamily Rental Program is too high and should be lowered. CDBG-DR funding should be leveraged to more than \$1 billion in new or rehabilitation of affordable housing



**Staff Response:** HCDD is committed to preserving and expanding the supply of affordable rental housing in Houston by leveraging its funding. The maximum award amount allows HCDD flexibility in project selection. HCDD will strive to leverage this funding to achieve the greatest housing benefit. HCDD will develop guidelines for housing programs which will contain more detailed information about requirements and priorities, including leveraging. These comments will be taken under consideration as HCDD develops these guidelines.

**Comment Received:** CDBG-DR funds should be used to advance equity in Houston's labor market. Recommendations include: 1) hire local residents impacted by Harvey for jobs created in the rebuilding process, 2) support construction training programs in Harvey impacted neighborhoods, including pre-apprenticeship programs, 3) contractors should demonstrate how they will enhance the community by providing safe jobs, fair compensation, and quality work, and 4) fund a workforce development program consistent to the scope of the damage to area homes.

**Staff Response:** As described in the local action plan, public service activities and the Economic Revitalization Program will include workforce development activities, job training, and assistance to microenterprises and small businesses, such as those that provide housing construction services. HCDD looks forward to working with local organizations to advance equity and resilience through workforce development in the long-term recovery process.

**Comment Received:** All affected districts in the City should be eligible for and benefit from CDBG-DR. Rehabilitation and reconstruction activities should be available to all, regardless of income, especially semi-retired/retired/persons with disabilities living on a fixed income that may be above low- and moderate-income caps. Clarification is requested regarding ineligibility of rehabilitation for those living in the floodplain without insurance. The sites for development of new single family and multifamily homes developed with CDBG-DR should not be located in floodplains and should be infill development. The funding designated for economic revitalization and planning should be reallocated for either homeowner/rental property rehabilitation or reconstruction or used for drainage and mitigation improvements and maintenance. The City should be transparent in the use of funding and provide the public with regular updates of programs, accomplishments, and expenditures.

**Staff Response:** HCDD is analyzing additional data regarding unmet needs and will utilize this analysis when developing program guidelines. The commenter's preference for using funding for all communities and persons regardless of income as well as the priority of serving residents on a fixed income will be taken under consideration as guidelines are developed. HCDD works to preserve and create quality housing and will consider these specifications and priorities for developing new housing when developing program guidelines. The maintenance of infrastructure is not eligible to be funded with CDBG, however constructing new or improved infrastructure is eligible. Additional CDBG-DR funding is expected to be announced in Fall 2018, which can be used for mitigation, such as infrastructure improvements. HCDD will continue to improve its public engagement process, which will include informing the public about program implementation and expenditures. Federal requirements specify that CDBG-DR funding may not be used to rehabilitate or reconstruct a home that has the following three conditions: 1) has a household where income is higher than 120% of the area median income (AMI), 2) the property is in a floodplain, and 3) the property owner did not maintain flood insurance on the property.

**Comment Received:** There has not been enough information given to help homeowners make decisions about demolishing, selling, or rebuilding their homes. Do the City and County engage with each other to allow homeowners to understand their options? The commenter did not like the meetings held.

**Staff Response:** As of the summer of 2018, CDBG-DR funding has not been provided to the City of Houston yet, and currently HCDD is developing guidelines for its housing programs utilizing data from storm impacts, resources made available to the City, and public input. The City works closely with Harris County Flood Control District, which does have targeted buyout areas and infrastructure improvements located in the city limits of Houston. We appreciate your participation in the public engagement meetings and welcome feedback on how to improve these meetings and better inform the public throughout the recovery process.

**Comment Received:** The following recommendations were made: 1) continue expanding outreach and community engagement efforts, 2) align goals with affordable housing and community development initiatives already underway in the city, 3) develop nonprofit capacity in all recovery programs, 4) provide quality case management, which is essential to recovery and investment is needed to ensure an individual's personal route to full recovery, 5) improve data and technology to inform solutions, and 6) commit to full transparency and accountability.

**Staff Response:** HCDD strives to build upon and expand its community engagement efforts in the long-term disaster recovery process, which will include transparency and accountability to gain public trust. As program guidelines are developed, efforts will be made to align programs to other initiatives, as appropriate. HCDD depends on nonprofit partners to help achieve its goals and will work to assist with providing opportunities for capacity building. HCDD agrees that case management is an important component to help individuals with personalized assistance and is in the selection process to hire a case management firm to supplement current staff. HCDD will research systems to store information that will serve the recovery process.

**Comment Received:** Edits should be made to tables in the local action plan reflecting updated information describing the Houston Housing Authority. Also, the total need reflected in Table 13 is much less than the actual need due to demolition and reconstruction costs not taken into account. This should be reflected in this table. An amount in the Multifamily Rental Housing Program should be set-aside to develop units for extremely low-income households.

**Staff Response:** Requested edits were made. As the City analyzes additional data and creates program guidelines, staff will consider your priority to fund rental housing for extremely low-income households.

## VII. Appendix C: Consultations

The City received rich feedback from all public meetings, through surveys, written notes, and map-based observations at the neighborhood level. The following are initial observations and a listing of meetings:

- **Some people have been able to rebuild, but others are stuck in unsafe homes:** All Houstonians prioritize the rebuilding of their homes. But there are differences in how quickly different communities have been able to recover based on their access to the resources needed for rebuilding. In areas where residents have repeatedly flooded or where poverty rates are high, some residents described still living in homes that have not been fully gutted, or with persistent mold that is causing health problems almost a year after the storm. Many people are worried that their homes aren't high enough to avoid future damage. And some residents who have undertaken repairs reported incurring personal debt to meet these costs.
- **Housing and drainage are deeply connected:** While our meetings were primarily about housing recovery, most people also identified drainage as a major concern. Outdated drainage infrastructure, lack of drainage maintenance, the need for varied stormwater management solutions, and enforcement of stormwater standards for new development were issues that residents identified in our meetings across the city.
- **In areas that didn't flood, longtime residents want protection from displacement:** Especially in close-in areas with short transit times to downtown, residents are concerned about being displaced. They fear that long-standing communities will break up in the face of real estate speculation, gentrification, rising rents, and increasing property taxes after Harvey.
- **In areas that flooded severely, a rise in vacant homes is threatening the fabric of communities:** Residents in areas with repeated flooding identified checkerboarded buyouts and a rise in damaged homes that have been abandoned as eroding the cohesiveness of their communities and the value of their homes.
- **Vulnerable Houstonians need special attention:** In every meeting, people expressed concern for neighbors who they saw as especially vulnerable: seniors, those with disabilities, mental health challenges, and others. They also shared their struggles to navigate multiple case management systems and the lack of reliable information about recovery resources.
- **Harvey heightened housing challenges for renters:** Many renters described moving, sometimes multiple times, since Harvey. They reported struggling to find decent affordable rental units that are safe from flooding. Renters also reported unscrupulous behavior by landlords, such as withholding security deposits or making only cosmetic repairs that left issues like mold unresolved. Many renters had not received FEMA assistance and were unaware of benefits that might have been available to them.

- **People want clear communication from trusted sources:** Especially with the start of hurricane season, residents want clear, easily accessible information from official sources. Information can't be limited to the internet and social media and needs to be available in print and through traditional media like newspapers, radio, and TV, in multiple languages.
- **People don't know what to do about contractor fraud:** Many residents reported losing money to contractors who collected payment without completing necessary repairs. There is a lack of awareness of what to do about contractor fraud, and few residents were aware of the State Attorney General's fraud reporting site at <https://texasattorneygeneral.gov/cpd/home-remodeling-and-repair>.
- **The loss of small business and community amenities are threatening hard-hit communities:** Communities with high poverty and widespread flooding reported losing small businesses, post offices, libraries, and community centers to the hurricane. People identified these community amenities as essential for providing opportunities for young people and keeping communities vibrant.
- **Delays and confusion in inspection and permitting processes are slowing down rebuilding:** For those with the resources to start rebuilding, frustrations are running high about the complexity and speed of permitting processes. Some who began doing repairs themselves or who have been helped by volunteer groups are receiving fines for not being up to current code. Renters expressed concern about the lack of inspectors for multi-family properties to enforce health and safety regulations.
- **People don't understand the disaster recovery process:** Many residents are confused by the different federal, state, local, and non-profit recovery programs, and almost all participants are frustrated with the pace of long-term recovery. Clear communication about the national disaster recovery framework is needed to help manage expectations and receive meaningful feedback from the community.

<b>DATE</b>	<b>MEETING</b>	<b>PARTIES REPRESENTED / PURPOSE</b>
4/25/2018	Small group meeting with potential community engagement partners	Discussed best practices for community engagement and identified potential community partners
5/2/2018	Small group meeting with potential community engagement partners	Discussed format and schedule for community engagement events
5/3/2018	Community engagement coordination meeting with other City Agencies	Consulted with other City Departments to coordinate community engagement
5/9/2018	Small group meeting with potential community engagement partners	Discussed format and schedule for community engagement events
5/16/2018	Small group meeting at 601 Sawyer St. with potential community engagement partners	Discuss format and schedule for community engagement events
5/19/2018	Community Meeting - Partnered with Texas Organizing Project at Harris County AFL-CIO	Gathered need and priority information from community residents, focused on the Eastside
5/20/2018	Presented at the Metropolitan Organization Harvey recovery event at Memorial Drive United Methodist Church	Shared information and answered questions about long-term recovery
5/23/2018	Community Meeting - Partnered with Texas Organizing Project at Denver Harbor Multi-Service Center	Gathered unmet need and priority information from community residents, focused on neighborhoods near Denver Harbor
5/24/2018	For Profit Housing Developer Focus Group – Hosted at HCDD office	Gathered information from for-profit developers to assess disaster recovery capacity and best practices for implementing upcoming affordable housing programs
5/25/2018	Non-Profit Housing Developer Focus Group – Partnered with LISC at LISC's offices	Gathered information from non-profit developers specific to expanding capacity for disaster recovery and best practices for implementing upcoming affordable housing programs

<b>DATE</b>	<b>MEETING</b>	<b>PARTIES REPRESENTED / PURPOSE</b>
5/26/2018	Community Meeting – Partnered with FIEL Houston at FIEL Houston	Gathered unmet need and priority information from community residents, focused on neighborhoods in Southwest Houston
5/29/2018	Community Meeting – Partnered with Texas Organizing Project at Acres Homes Multi-Service Center	Gathered unmet need and priority information from community residents, focused on neighborhoods around Acres Homes
6/2/2018	Community Meeting – Partnered with Texas Organizing Project at Greater St. Matthew Baptist Church	Gathered unmet need and priority information from community residents, focused on neighborhoods in Sunnyside and Southpark
6/2/2018	Community Meeting – Partnered with Texas Organizing Project at the Northeast Multi-Service Center	Gather unmet need and priority information from community residents, focused on neighborhoods in the Northeast
6/2/2018	Participated in the Extreme Weather Ready Expo at the George R. Brown Convention Center	Distributed surveys to residents interested in disaster preparedness
6/6/2018	Teletownhall – Partnered with AARP (English)	Dial-in format to reach seniors and answer questions about recovery
6/7/2018	Teletownhall – Partnered with AARP and Univision (Spanish)	Dial-in format to reach seniors and answer questions about recovery
6/7/2018	Community Meeting – Partnering with Texas Organizing Project at the SW Multi-Service Center	Gather unmet need and priority information from community residents, focused on neighborhoods in the Southwest
6/11/2018	Presented at the Super Neighborhood Alliance meeting at City Hall Annex	Share information with neighborhood leadership
6/12/2018	Presented at the Kashmere Gardens Super Neighborhood Council meeting at the Kashmere Multiservice Center	Share information with affected residents about long-term recovery
6/13/2018	Presented on the Disability Community Harvey Recovery Call hosted by the Mayor's Office of People with Disabilities	Share information with disability rights advocates

<b>DATE</b>	<b>MEETING</b>	<b>PARTIES REPRESENTED / PURPOSE</b>
6/13/2018	Community Meeting – Partnered with Council Members Gallegos and Davis, and Super Neighborhoods 57 and 59 at the Judson Robinson, Sr. Community Center	Gather need and priority information from community residents, focused on neighborhoods in the Pleasantville and Clinton Park neighborhoods
6/14/2018	Presented at the Houston Housing Collaborative at the Montrose Center	Share information with housing advocates
6/16/2018	Community Meeting – Partnered with Council Member Boykins at San Jacinto Community College	Gather need and priority information from community residents, focused on District D
6/16/2018	Presented at the TOP annual meeting at TOP's office	Report back on disaster recovery community meetings co-hosted with TOP
6/18/2018	Community Meeting – Partnered with the Emancipation Economic Development Council at Blackshear Elementary School	Gather need and priority information for community residents, focused on Third Ward
6/19/2018	Community Meeting – Partnered with Council Member Martin at the St. Stephen Presbyterian Church	Gather need and priority information for community residents, focused on Southeast Houston
6/20/2018	Community Meeting – Partnered with Council Member Castex-Tatum	Gather need and priority information from community residents, focused on neighborhoods in District K
6/21/2018	Community Meeting – Partnered with the East Houston Civic Association at the East Houston Civic Association	Gather need and priority information from community residents, focused on neighborhoods in East Houston
6/23/2018	Community Meeting – Partnered with Council Member Travis at the Tallowood Baptist Church	Gather need and priority information from community residents, focused on neighborhoods in District G